

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MICHAEL PICARELLA,

Plaintiff,

-against-

HSBC SECURITIES (USA) INC.,

Defendant.

Case No. 14-cv-4463 (ALC) (AJP)

**JOINT PRETRIAL ORDER**

The parties having conferred among themselves pursuant to Fed. R. Civ. P. 16 and the Individual Practices of the Honorable Judge Andrew L. Carter, Jr., the following statements, directions and agreements are adopted as the Pretrial Order herein.

**1. TRIAL COUNSEL**

**A. Plaintiff's Counsel:**

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**B. Defendant's Counsel:**

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## **2. SUBJECT MATTER JURISDICTION**

Plaintiff brings claims for damages and remedies under Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.* (“Title VII”), the New York City Human Rights Law, N.Y.C. Admin. Code § 8-101 *et seq.* (“NYCHRL”), and the New York State Human Rights Law, N.Y. Exec. Law § 290 *et seq.* (“NYSHRL”), alleging retaliation against his former employer. This Court thus has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331, 1343, and 1367.

Defendant does not contest the presence of subject matter jurisdiction.

## **3. SUMMARY OF CLAIMS AND DEFENSES**

### **A. Claims of Plaintiff**

On June 20, 2014, Plaintiff Michael Picarella filed a civil action against Defendant for unlawful retaliation in violation of Title VII (42 U.S.C. § 2000e-3(a)), the NYCHRL (N.Y.C. Admin. Code §§ 8-107(7) & (19)), and the NYSHRL (N.Y. Exec. Law § 296). Picarella’s complaint asserts that Defendant HSBC (USA) Securities, Inc. retaliated against him for complaining to HSBC management that his co-worker, herein referred to here as Jane Doe, was sexually harassed by HSBC executives. Beginning in Spring 2012, and continuing throughout 2013, Picarella complained to HSBC senior management, and its Human Resources department,

orally and in writing, that a young female co-worker (“Jane Doe”) had been sexually harassed by senior HSBC executives, both in the bank’s New York offices, and at off-site conferences. The sexual harassment Picarella reported included subjecting Doe to sexually-intimidating remarks, pressuring Doe to have sex with senior male HSBC executives, sexually-intimidating touching of Doe by senior male HSBC executives, and false reports by executives to HSBC employees that Doe was having sex at off-site conferences with HSBC clients.

Picarella’s complaint alleges that HSBC retaliated against him for complaining of this sexual harassment of his co-worker by taking a series of materially adverse actions against him, including denying him a promotion he was promised when he was hired; freezing his compensation at 2011 levels; demoting him; excluding him from important meetings; severely reducing his job responsibilities and assignments; assigning him duties normally assigned to clerical workers; refusing to assign him new work normally assigned to his job title; criticizing his experience and qualifications; disparaging him by telling his co-workers that he did not have a future at HSBC because he had complained about the sexual harassment of Doe; and terminating his employment, and that such retaliation was motivated in part and thus caused by his complaints of unlawful conduct by HSBC.

Picarella asserts that HSBC’s unlawful conduct has caused him damages in the form of loss of earnings and earning capacity, known as back pay and front pay; compensatory damages in the form of reputational damage and mental pain and anguish, and that he is entitled to punitive damages because the retaliation was a knowing, intentional, and reckless violation of his rights.

**B. Defenses of Defendant**

Defendant will defend the case on the grounds that Plaintiff's alleged protected activity was not the cause of any alleged adverse employment action, and that some of the alleged adverse employment actions occurred before Plaintiff engaged in any protected activity.

Defendant will further defend the case on the grounds that there were legitimate, non-retaliatory reasons for terminating Plaintiff's employment. The evidence clearly demonstrates that Plaintiff consistently failed to meet the expectations of his employer and that this poor performance is the reason for the termination of his employment. The contemporaneous documentation attesting to Plaintiff's performance failures, some of which predates any alleged protected activity, defeats any claim that poor performance was simply pretext for retaliation. Defendant will also demonstrate that many of the alleged adverse employment actions either never occurred or do not rise to the level of actionable adverse employment actions as a matter of law.

Defendant will further defend the case on the grounds that Plaintiff has not suffered any damages that are recoverable in this case and failed to mitigate his alleged damages.

**4. JURY/NON-JURY AND LENGTH OF TRIAL**

The case is to be tried to a jury.

The parties estimate that 7 trial days are required, plus an additional half day for jury selection.

**5. TRIAL BY MAGISTRATE JUDGE**

The parties do not consent to trial by a magistrate judge.

**6. STIPULATIONS OR AGREED STATEMENTS OF FACT OR LAW**

1. Defendant HSBC Securities (USA) Inc. ("HSBC") is a Delaware corporation with its principal place of business at 452 Fifth Avenue, New York, New York 10018.

2. Plaintiff Michael Picarella was employed by HSBC as a Senior Vice President in Sales Management, Global Markets (Americas) from May 5, 2011 until March 26, 2015.

3. Jane Doe was employed by HSBC as an Analyst in Sales Management, Global Markets (Americas) from February 2010 until May 31, 2012.

4. Doe's employment by HSBC was terminated on May 31, 2012, effective June 1, 2012.

5. Doe subsequently alleged that certain HSBC employees had sexually harassed her.

6. Eileen Hedges was employed by HSBC as a Senior Vice President and the Head of Business Development (Americas) from 2007 to August 2012.

7. Doe reported to Hedges from March 2010 until May 31, 2012.

8. Picarella reported to Hedges from May 2011 until July 2012.

9. Suzanna ("Suzy") White is a Managing Director and the Chief Operating Officer for Global Markets (Americas) at HSBC and has held that role since on or around November 2011.

10. Prior to becoming Chief Operating Officer, White was Deputy Chief Operating Officer.

11. White supervised Picarella from July 2012 until September 2012.

12. After September 2012, White no longer supervised Picarella and had limited day-to-day interaction with him.

13. Carlos Pablo Pizzimbono was employed by HSBC as a Managing Director and the Head of Sales for Global Markets (Americas) during the relevant period

14. Pizzimbono never directly supervised Picarella.

15. Carol Semetulskis, formerly Carol Jenner, was promoted to Head of Sales Business Management (Americas) at HSBC in September 2012 and was subsequently promoted to Senior Vice President.

16. Prior to that, Semetulskis was a Vice President and Operational Risk Manager at HSBC.

17. From 2006 until September 2014, Michael Karam was the Chief Operating Officer and Business Manager for Global Precious Metals at HSBC.

18. Since September 2014, Karam has been HSBC's Head of Sales Business Management for Global Markets (Americas).

19. Ellen Weiss was at all relevant times Head of Human Resources for HSBC Global Banking and Markets (Americas).

20. From January 2010 until March 2012, Didier Descamps was the Co-Head of Global Markets at HSBC.

21. Since March 2012, Descamps has served as the Head of Global Markets (Americas).

22. Picarella was hired by HSBC in May 2011 as a Senior Vice President in Sales Management, Global Markets (Americas).

23. Picarella's initial salary at HSBC was \$225,000 per year.

24. Hedges completed Picarella's mid-year 2011 review, which she discussed with Picarella on August 17, 2011.

25. At the time of the mid-year 2011 reviews, HSBC employees' ratings were calibrated as follows: 20% of employees received either a "1-Exceptional" or "2-Outstanding"

rating, 70% of employees received a “3- Strong”, and 10% of employees received either a “4-Inconsistent” or “5-Poor” rating.

26. Hedges completed Picarella’s year-end 2011 review, which she discussed with Picarella on December 21, 2011.

27. In his 2011 year-end review discussion, Hedges informed Picarella that Pizzimbono and White “did not think highly” of him.

28. In his 2011 year-end review, Hedges told Picarella that “it might be a good idea if [he] looked for another job.”

29. Picarella received a discretionary bonus for the year 2011 in the amount of \$60,000.

30. Picarella “anticipated [his] bonus being higher than what [he] had received.”

31. Beginning in April 2012, Picarella repeatedly asserted in emails to Pizzimbono, White, and other senior employees that certain HSBC clients did not have Relationship Managers, in violation of HSBC policy.

32. In the spring of 2012, Picarella approached Pizzimbono in Pizzimbono’s office and asked if he could speak with him.

33. On April 16, 2012, Picarella met with Weiss regarding Hedges.

34. On that day, Weiss told Picarella that she would “prefer HR to get involved due to the seriousness of the issues he had brought to [her] attention.”

35. On April 18, 2012, Weiss initiated a meeting with Picarella regarding Hedges.

36. On April 26, 2012, Sue Jang, an HSBC Vice President in Human Resources, met with Hedges to discuss Picarella’s complaint.

37. HSBC Human Resources investigated Picarella’s additional allegations.

38. On June 29, 2012, Weiss updated Picarella about the status of HSBC's investigation into his complaints.

39. Following the removal of Hedges from her managerial role, White served as Picarella's direct supervisor on a temporary basis from July 2012 through September 2012.

40. On July 30, 2012, Pizzimbono met with Picarella and explained that Hedges had been removed from her role, that the Sales Management group would be restructured, and that he would temporarily report to White.

41. When White and Pizzimbono were considering candidates to replace Hedges, Semetulskis' two most recent HSBC performance reviews provided her a "2" rating, which placed her in the top twenty percent of HSBC employees.

42. On or around September 5, 2012, White and Pizzimbono met with Picarella to discuss the new restructuring plan for the Sales Management team, including Semetulskis' new role.

43. On September 24, 2012, White and Pizzimbono gave Picarella his mid-year 2012 review.

44. Before giving Picarella his mid-year review for 2012, White asked him to provide a list of individuals he had worked with at HSBC during the first half of 2012 who could offer feedback on his performance.

45. White contacted several individuals from that list to solicit their feedback on Picarella's work performance for the first half of 2012.

46. These individuals came from a variety of roles and functions, including co-workers in compliance, Picarella's peers on the Business Management team, and senior members of the Global Markets Management team.



47. On October 5, 2012, Picarella emailed White that he had “zero capacity . . . actually in deficit,” noting that he currently was “covering sales functions that [Doe] and John Henry were covering in addition to my normal job functions and DF and Suitability.”

48. On October 12, 2012, Picarella complained to Mary Bilbrey that he was “buried in work.”

49. During the same period, Picarella told Semetulskis that he was “over capacity and cannot take on any additional responsibilities.”

50. Picarella received a discretionary bonus of \$57,200 for the year 2012.

51. Karam had previously been the Chief Operating Officer and Business Manager for Global Precious Metals at HSBC.

52. In his new role, as of September 2014, Karam became the Head of Sales Business Management for Global Markets (Americas).

53. Karam had never worked directly with Picarella prior to May 2013.

54. On May 21, 2013, Karam asked Picarella to address the Client On-Boarding Committee meeting regarding account closures for 310 clients and “RM sponsorship” for 24 new clients.

55. On June 27, 2013, Picarella filed a Charge of Discrimination against HSBC with the Equal Employment Opportunity Commission.

56. On September 27, 2013, Karam and Picarella met to discuss and confirm Picarella’s role as an “SVP” in the “Business Manager/COO community,” and the corresponding “responsibilities expected” of him.

57. On December 10, 2013, Picarella received his mid-year 2013 review.

58. On May 16, 2014, Karam discussed Picarella’s year-end 2013 review with him.

59. Picarella received a discretionary bonus of \$56,056 for the year 2013.

60. Every HSBC employee is required to set annual objectives.

61. In or about May 2014, Karam asked Picarella to set his annual objectives for 2014.

62. On September 22, 2014, Karam emailed Picarella asking him to finalize his objectives.

63. Picarella did not finalize his objectives by the deadline Karam set in his September 22 email.

64. As of October 7, 2014, Picarella had not finalized his objectives.

65. On or about November 21, 2014, Karam discussed Picarella's mid-year 2014 review with him.

66. In his mid-year 2014 review, Picarella received a rating of "Off-track."

67. In 2014, Picarella did "HSBC-related work less than 10 percent of the time [he was] at the office."

68. Instead, he used that time for "different things [he] needed to take care of in [his] personal life", to speak with "friends in the building" and to "read the news on the internet."

69. Picarella did not receive a discretionary bonus for the year 2014.

70. On November 24, 2014, Picarella submitted an email to Mary Bilbrey, and stated that he "feared for [his] safety" during his mid-year review and was "filing a formal complaint about [his] manager, Mr. Karam and his threatening behavior during [Picarella's] 2014 Mid-year assessment."

71. On November 26, 2014, Maria Malanga, an employee relations specialist within HSBC Human resources, notified Picarella that he should work from his home pending an HSBC

investigation into the allegations and safety concerns raised by Picarella in his complaint about Karam's conduct.

72. Picarella did not check his work emails on his HSBC-issued device between November 26, 2014 at approximately 4:45pm and December 1, 2014 at 9:00am.

73. In late 2014 or early 2015, Picarella recorded a conversation between himself and two HSBC Human Resources officers without their knowledge or consent despite knowing that HSBC has "a policy regarding recording conversations."

74. On January 13, 2015, Daniel Silber, Head of Institutional Sales for Global Markets (Americas) at HSBC, led an internal sales team call. The call included a confidential briefing by HSBC counsel and was potentially privileged. Picarella dialed into the call from home.

75. HSBC initiated an investigation to determine whether an employee disclosed internal information to the reporter or other third party in violation of HSBC policy.

76. By letter dated January 15, 2015, HSBC notified Picarella's counsel that Picarella would be placed on paid administrative leave pending an investigation into his involvement in the leak of confidential HSBC information to a third party.

77. In the meeting, Picarella "stated that he had not disclosed any information regarding HSBC or his litigation to any member of the media," that "he had sent HSBC documents and communications related to his performance to himself and his attorney," and that "he may have discussed the January 13 Call with his attorney, Mr. Hubbard."

78. In March 2015, at a meeting with Descamps and Susan Roskell, Head of Human Resources for Global Banking and Markets and Private Banking (Americas), Karam recommended that HSBC terminate Picarella's employment on the basis of his performance record.

79. Descamps approved the termination of Picarella's employment.

80. Picarella's salary never decreased while he worked at HSBC.

81. Picarella's position and title remained Senior Vice President throughout his tenure at HSBC.

**7. LIST OF WITNESSES**

**A. Plaintiff's Witnesses:**

<b><u>Name</u></b>	<b><u>Subject(s) of Anticipated Testimony</u></b>	<b><u>Contact Information</u></b>	<b><u>Definite/Possible</u></b>	<b><u>Objections</u></b>
Mary Bilbrey	Picarella's complaints concerning (i) the sexual harassment of Doe by HSBC executives; and (ii) the retaliation he was subjected to following his complaints of the sexual harassment of Doe.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Definite	No
Didier Descamps	Picarella's complaints concerning (i) the sexual harassment of Doe by HSBC executives; and (ii) the retaliation he was subjected to following his complaints of the sexual harassment of Doe; as well as HSBC's investigation into the disclosure of internal confidential discussions from the January 13, 2015 sales group meeting.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Definite	No

<u>Name</u>	<u>Subject(s) of Anticipated Testimony</u>	<u>Contact Information</u>	<u>Definite/Possible</u>	<u>Objections</u>
Jane Doe	Reports of Sexual Harassment to Picarella and others; Reports of Sexual Harassment at HSBC; Performance of Hedges, Performance of Christopher DeLuca; SameTime Correspondence with Hedges and DeLuca; Performance of Picarella.	c/o Lupkin & Associates PLLC 26 Broadway 19 <sup>th</sup> Floor New York, New York 10004 (646) 367-2772	Possible	Yes
Eileen Hedges	Picarella's complaints and reports of Sexual Harassment of Jane Doe; Performance of Michael Picarella; her own performance; Disciplinary action taken by HSBC; Termination of her employment; Internal communications with Jane Doe; Investigation of complaints of Sexual Harassment.	c/o Wigdor, LLP 85 Fifth Avenue, Suite 5 New York, New York 10003 (212) 257-6800	Possible	Yes
Brian Goldwasser	Picarella's performance and responsibilities while at HSBC.	c/o Liddle & Robinson, LLP 800 Third Avenue New York, New York 10022 (212) 687-8500	Definite	Yes

<b><u>Name</u></b>	<b><u>Subject(s) of Anticipated Testimony</u></b>	<b><u>Contact Information</u></b>	<b><u>Definite/Possible</u></b>	<b><u>Objections</u></b>
Sue Jang	HSBC's investigation of Picarella's complaints of the sexual harassment of Doe.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Definite	No
Michael Karam	Interactions with Picarella as his supervisor; Picarella's complaints concerning the sexual harassment of Doe by HSBC executives and the retaliation he was subjected to following his complaints of the sexual harassment of Doe; and the circumstances surrounding Picarella's termination	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Definite	No
Matt Kutas	HSBC's investigation into the disclosure of internal confidential discussions from the January 13, 2015 sales group meeting	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Possible	No

<u>Name</u>	<u>Subject(s) of Anticipated Testimony</u>	<u>Contact Information</u>	<u>Definite/Possible</u>	<u>Objections</u>
Maria Malanga	Picarella's complaints concerning (i) the sexual harassment of Doe by HSBC executives, and (ii) the retaliation he was subjected to following his complaints of the sexual harassment of Doe	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Definite	No
Ian Mullen	Picarella's complaints concerning the sexual harassment of Doe by HSBC executives; Picarella's hiring by HSBC; Picarella's performance at HSBC; Hedges' performance at HSBC; HSBC's failure to promote Picarella as Hedges' successor and effect on Picarella; Complaints regarding performance of Suzanna White.	c/o Liddle & Robinson, LLP 800 Third Avenue New York, New York 10022 (212) 687-8500	Definite	Yes
Michael Picarella	All subjects at issue under the Complaint.	c/o Liddle & Robinson, LLP 800 Third Avenue New York, New York 10022 (212) 687-8500	Definite	No

<b><u>Name</u></b>	<b><u>Subject(s) of Anticipated Testimony</u></b>	<b><u>Contact Information</u></b>	<b><u>Definite/Possible</u></b>	<b><u>Objections</u></b>
Pablo Pizzimbono	Picarella's complaints concerning (i) the sexual harassment of Doe by HSBC executives; and (ii) the retaliation he was subjected to following his complaints of the sexual harassment of Doe.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Possible	No
Kenneth Rathjen	Picarella's performance; and the financial services industry generally (and HSBC specifically).	c/o Liddle & Robinson, LLP 800 Third Avenue New York, New York 10022 (212) 687-8500	Definite	Yes
James Rist	Complaints of Sexual Harassment of Jane Doe; Sexual Harassment of Jane Doe; Performance of Picarella; Statements made by White regarding the investigation of Picarella's Complaints.	c/o Liddle & Robinson, LLP 800 Third Avenue New York, New York 10022 (212) 687-8500	Possible	Yes
Susan Roskell	Circumstances surrounding Picarella's termination.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Definite	No



<u>Name</u>	<u>Subject(s) of Anticipated Testimony</u>	<u>Contact Information</u>	<u>Definite/Possible</u>	<u>Objections</u>
Daniel Silber	HSBC's accusations that Picarella leaked internal confidential discussions from the January 13, 2015 sales group meeting.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Definite	No
Ellen Weiss	Picarella's complaints concerning the sexual harassment of Doe by HSBC executives.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Definite	No
Suzanna White	Picarella's complaints concerning (i) the sexual harassment of Doe by HSBC executives, and (ii) the retaliation he was subjected to following his complaints of the sexual harassment of Doe, as well as HSBC's internal investigation into the disclosure of internal confidential discussions from the January 13, 2015 sales group meeting.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Definite	No

**B. Defendant's Witnesses:**

<u>Name</u>	<u>Subject(s) of Anticipated Testimony</u>	<u>Contact Information</u>	<u>Definite/Possible</u>	<u>Objections</u>
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<b><u>Name</u></b>	<b><u>Subject(s) of Anticipated Testimony</u></b>	<b><u>Contact Information</u></b>	<b><u>Definite/Possible</u></b>	<b><u>Objections</u></b>
Mary Bilbrey	Plaintiff's allegations of retaliation.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Possible	No
Christopher DeLuca	Plaintiff's job performance.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Definite	Yes
Didier Descamps	Plaintiff's job performance; Adverse employment actions allegedly suffered by Plaintiff; Defendant's termination of Plaintiff's employment.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Possible	No
Sue Jang	Plaintiff's alleged communications regarding sexual harassment.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Possible	No
Michael Karam	Plaintiff's job performance; Adverse employment actions allegedly suffered by Plaintiff; Defendant's termination of Plaintiff's employment.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Definite	No
Maria Malanga	Plaintiff's allegations of retaliation.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Definite	No

<u>Name</u>	<u>Subject(s) of Anticipated Testimony</u>	<u>Contact Information</u>	<u>Definite/Possible</u>	<u>Objections</u>
Michael Picarella	Plaintiff's job performance; Plaintiff's alleged communications regarding sexual harassment; Plaintiff's allegations of retaliation; Adverse employment actions allegedly suffered by Plaintiff; Defendant's termination of Plaintiff's employment; Plaintiff's damages.	221 Barton Avenue Melville, NY 11747	Definite	No
Pablo Pizzimbono	Plaintiff's job performance; Plaintiff's alleged communications regarding sexual harassment; Plaintiff's allegations of retaliation; Adverse employment actions allegedly suffered by Plaintiff.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Definite	No
Susan Roskell	Defendant's termination of Plaintiff's employment.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Possible	No
Daniel Silber	Plaintiff's job performance; Defendant's termination of Plaintiff's employment.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Possible	No
Ellen Weiss	Plaintiff's alleged communications regarding sexual harassment; Plaintiff's allegations of retaliation.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Definite	No
Jennifer Whang	Plaintiff's alleged communications regarding sexual harassment; Plaintiff's allegations of retaliation.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Possible	No

<u>Name</u>	<u>Subject(s) of Anticipated Testimony</u>	<u>Contact Information</u>	<u>Definite/Possible</u>	<u>Objections</u>
Suzanna White	Plaintiff's job performance; Plaintiff's allegations of retaliation; Adverse employment actions allegedly suffered by Plaintiff.	c/o Boies, Schiller & Flexner LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300	Definite	No

Defendant reserves the right to call additional witnesses for the purposes of rebuttal and/or impeachment.

## 8. DESIGNATION OF DEPOSITION TESTIMONY

### A. Plaintiff's Designations:

<u>Deposition</u>	<u>Begin Designation</u>	<u>End Designation</u>	<u>Cross-Designations</u>	<u>Objections</u>
Didier Descamps	4:2	5:3	None	None
Didier Descamps	5:6	5:20	None	None
Didier Descamps	5:22	6:5	6:6 – 6:13	Hearsay; Privilege
Didier Descamps	7:2	8:4	None	None
Didier Descamps	8:11	8:13	None	Relevance; Prejudicial/confusion/waste of time; Hearsay
Didier Descamps	8:24	9:10	9:11 – 9:22	Relevance; Prejudicial/confusion/waste of time; Hearsay
Didier Descamps	9:23	10:18	None	None
Didier Descamps	11:2	11:13	None	Hearsay
Didier Descamps	11:16	12:9	None	Hearsay
Didier Descamps	13:4	13:19	13:20-13:24	Hearsay
Didier Descamps	13:25	14:4	None	Foundation; Speculative; Hearsay
Didier Descamps	14:6	14:18	None	Foundation; Speculative; Hearsay

<b><u>Deposition</u></b>	<b><u>Begin Designation</u></b>	<b><u>End Designation</u></b>	<b><u>Cross-Designations</u></b>	<b><u>Objections</u></b>
Didier Descamps	14:21	16:4	None	Foundation; Speculative; Hearsay
Didier Descamps	16:9	16:11	None	None
Didier Descamps	16:13	16:25	None	None
Didier Descamps	17:4	17:9	17:12 – 18:20, 19:5 – 19:11, 20:2 – 20:18	None
Didier Descamps	22:14	23:6	None	Relevance; Prejudicial/confusion/waste of time
Didier Descamps	23:14	23:23	None	Relevance; Prejudicial/confusion/waste of time
Didier Descamps	24:3	25:18	None	None
Didier Descamps	25:22	26:6	None	None
Didier Descamps	26:11	26:17	None	Privilege
Didier Descamps	26:19	26:25	None	Privilege
Didier Descamps	27:3	27:5	None	Privilege
Didier Descamps	27:24	27:25	None	None
Didier Descamps	28:4	28:6	None	None
Didier Descamps	28:8	29:10	None	Relevance; Prejudicial/confusion/waste of time; Foundation; Speculative
Didier Descamps	29:13	29:24	None	Relevance; Prejudicial/confusion/waste of time; Lacks foundation/speculative
Didier Descamps	30:2	30:13	None	Relevance; Prejudicial/confusion/waste of time; Foundation; Speculative
Didier Descamps	30:16	30:21	None	Relevance; Prejudicial/confusion/waste of time; Foundation; Speculative

<b><u>Deposition</u></b>	<b><u>Begin Designation</u></b>	<b><u>End Designation</u></b>	<b><u>Cross-Designations</u></b>	<b><u>Objections</u></b>
Didier Descamps	30:24	31:3	None	Relevance; Prejudicial/confusion/waste of time; Foundation; Speculative
Didier Descamps	31:7	31:11	None	Relevance; Prejudicial/confusion/waste of time; Foundation; Speculative
Didier Descamps	32:2	32:4	None	Relevance; Prejudicial/confusion/waste of time
Didier Descamps	32:6	32:12	None	Relevance; Prejudicial/confusion/waste of time
Didier Descamps	32:23	35:13	None	Relevance; Prejudicial/confusion/waste of time; Foundation; Speculative
Didier Descamps	35:24	36:24	None	Hearsay
Didier Descamps	37:2	37:17	None	Foundation; Speculative
Didier Descamps	37:19	39:10	None	Foundation; Speculative
Didier Descamps	39:12	39:21	None	Foundation; Speculative
Didier Descamps	39:25	40:7	None	Foundation; Speculative
Didier Descamps	40:10	41:4	None	Foundation; Speculative
Didier Descamps	41:6	41:6	None	Foundation; Speculative
Didier Descamps	41:8	41:18	None	None
Didier Descamps	41:25	44:12	None	Foundation; Speculative
Didier Descamps	44:14	45:8	None	Foundation; Speculative
Didier Descamps	45:10	45:12	None	Foundation; Speculative
Didier Descamps	45:14	45:17	None	Foundation; Speculative
Didier Descamps	45:19	45:25	None	Foundation; Speculative
Didier Descamps	46:3	46:21	None	Prejudicial/confusion/waste of time; Foundation; Speculative

<u>Deposition</u>	<u>Begin Designation</u>	<u>End Designation</u>	<u>Cross-Designations</u>	<u>Objections</u>
Didier Descamps	46:25	46:25	None	Foundation; Speculative
Didier Descamps	47:3	47:14	None	None
Didier Descamps	47:17	47:22	None	Hearsay
Didier Descamps	47:24	48:5	None	None
Didier Descamps	48:7	49:22	None	None
Didier Descamps	50:18	51:16	None	None
Didier Descamps	51:18	52:14	None	Lacks foundation/speculative
Didier Descamps	52:16	53:19	None	Lacks relevance; Unduly prejudicial/confusion/waste of time
Didier Descamps	54:7	55:18	None	None
Didier Descamps	55:22	55:25	None	None
Didier Descamps	56:3	56:9	None	None
Didier Descamps	56:12	56:16	None	None
Ian Mullen	4:7	4:9	None	None
Ian Mullen	4:15	4:24	None	None
Ian Mullen	6:2	7:17	None	None
Ian Mullen	8:3	11:18	None	Relevance; Prejudicial/confusion/waste of time
Ian Mullen	14:4	16:7	None	None
Ian Mullen	16:17	16:19	None	None
Ian Mullen	16:21	17:5	None	None
Ian Mullen	17:10	18:13	None	None
Ian Mullen	24:15	24:21	None	Relevance; Prejudicial/confusion/waste of time
Ian Mullen	25:2	25:5	None	Relevance; Prejudicial/confusion/waste of time
Ian Mullen	25:7	26:13	None	Relevance; Prejudicial/confusion/waste of time

<u>Deposition</u>	<u>Begin Designation</u>	<u>End Designation</u>	<u>Cross-Designations</u>	<u>Objections</u>
Ian Mullen	26:18	27:18	27:19 – 28:8	Relevance; Prejudicial/confusion/waste of time; Foundation; Speculative; Hearsay
Ian Mullen	28:15	28:19	None	Foundation; Speculative; Hearsay
Ian Mullen	29:5	30:12	None	Foundation; Speculative; Hearsay
Ian Mullen	30:24	31:4	32:11-32:23	Foundation; Speculative
Ian Mullen	34:22	35:18	None	Relevance; Prejudicial/confusion/waste of time
Ian Mullen	35:22	36:10	None	Relevance; Prejudicial/confusion/waste of time
Ian Mullen	36:12	36:19	None	Relevance; Prejudicial/confusion/waste of time
Ian Mullen	36:21	37:12	None	Relevance; Prejudicial/confusion/waste of time

**B. Defendant's Designations:**

<u>Deposition</u>	<u>Begin Designation</u>	<u>End Designation</u>	<u>Cross-Designations</u>	<u>Objections</u>
Michael Picarella	6:13	9:16		
Michael Picarella	10:05	15:13		
Michael Picarella	16:14	17:19		
Michael Picarella	19:04	19:11		
Michael Picarella	19:16	21:05		
Michael Picarella	21:09	21:20		
Michael Picarella	22:13	25:16		
Michael Picarella	25:22	29:24		
Michael Picarella	29:25	33:25		
Michael Picarella	34:03	35:13		
Michael Picarella	35:14	36:11		
Michael Picarella	36:22	41:25		
Michael Picarella	42:12	42:22		
Michael Picarella	43:10	46:10		
Michael Picarella	46:24	49:17		
Michael Picarella	50:08	51:10		
Michael Picarella	52:09	53:22		
Michael Picarella	54:04	55:16		
Michael Picarella	55:20	57:13		



<u>Deposition</u>	<u>Begin Designation</u>	<u>End Designation</u>	<u>Cross-Designations</u>	<u>Objections</u>
Michael Picarella	57:17	58:03		
Michael Picarella	58:08	58:12		
Michael Picarella	58:17	60:03		
Michael Picarella	62:16	64:25		
Michael Picarella	67:10	68:04		
Michael Picarella	69:21	70:21		
Michael Picarella	72:21	74:13		
Michael Picarella	75:04	75:15		
Michael Picarella	76:13	77:10		
Michael Picarella	80:13	82:03		
Michael Picarella	84:09	84:17		
Michael Picarella	85:22	86:15		
Michael Picarella	87:10	87:19		
Michael Picarella	88:19	89:6		
Michael Picarella	89:23	91:13		
Michael Picarella	93:09	94:22		
Michael Picarella	95:03	95:19		
Michael Picarella	96:25	99:11		
Michael Picarella	100:22	101:14		
Michael Picarella	102:02	102:07		
Michael Picarella	104:06	104:15		
Michael Picarella	106:08	106:11		
Michael Picarella	107:20	108:08		
Michael Picarella	108:15	109:21		
Michael Picarella	109:22	111:02		
Michael Picarella	111:15	111:17		
Michael Picarella	112:02	114:09		
Michael Picarella	114:12	115:03		
Michael Picarella	115:04	116:12		
Michael Picarella	116:13	116:23		
Michael Picarella	117:06	117:16		
Michael Picarella	117:24	118:24		
Michael Picarella	120:09	120:14		
Michael Picarella	124:04	126:07		
Michael Picarella	126:08	127:06		
Michael Picarella	127:12	129:17		
Michael Picarella	129:18	131:21		
Michael Picarella	131:22	132:19		
Michael Picarella	132:20	135:19		
Michael Picarella	141:11	141:22		
Michael Picarella	141:23	142:12		
Michael Picarella	142:02	145:17		
Michael Picarella	148:07	149:02		

<u>Deposition</u>	<u>Begin Designation</u>	<u>End Designation</u>	<u>Cross-Designations</u>	<u>Objections</u>
Michael Picarella	149:03	149:09		
Michael Picarella	150:14	152:14		
Michael Picarella	154:08	155:13		
Michael Picarella	157:7	157:10		
Michael Picarella	160:05	161:17		
Michael Picarella	162:06	166:14		
Michael Picarella	169:02	169:17		
Michael Picarella	172:16	173:20		
Michael Picarella	175:05	175:09		
Michael Picarella	179:23	180:11		
Michael Picarella	181:10	181:12		
Michael Picarella	181:19	182:13		
Michael Picarella	184:04	184:20		
Michael Picarella	186:05	189:16		
Michael Picarella	192:05	194:05		
Michael Picarella	194:06	196:20		
Michael Picarella	196:21	197:11		
Michael Picarella	198:02	199:15		
Michael Picarella	200:06	200:21		
Michael Picarella	200:22	201:07		
Michael Picarella	201:21	202:12		
Michael Picarella	202:21	203:14		
Michael Picarella	204:13	204:15		
Michael Picarella	204:22	204:24		
Michael Picarella	204:25	206:02		
Michael Picarella	206:07	207:24		
Michael Picarella	208:09	209:09		
Michael Picarella	209:14	211:03		
Michael Picarella	212:04	212:11		
Michael Picarella	212:12	213:17		
Michael Picarella	213:18	215:05		
Michael Picarella	215:18	216:12		
Michael Picarella	216:22	219:18		
Michael Picarella	219:23	223:05		
Michael Picarella	228:04	230:02		
Michael Picarella	230:13	231:03		
Michael Picarella	232:09	232:21		
Michael Picarella	233:08	234:08		
Michael Picarella	235:07	242:16		
Michael Picarella	243:23	244:12		
Michael Picarella	244:18	246:18		
Michael Picarella	249:12	250:09		
Michael Picarella	250:18	253:02		

<u>Deposition</u>	<u>Begin Designation</u>	<u>End Designation</u>	<u>Cross-Designations</u>	<u>Objections</u>
Michael Picarella	253:12	253:19		
Michael Picarella	254:13	255:15		
Michael Picarella	257:17	267:03		
Michael Picarella	267:14	272:23		
Michael Picarella	274:09	274:25		
Michael Picarella	276:23	276:25		
Michael Picarella	279:13	279:23		
Michael Picarella	281:19	281:21		
Michael Picarella	282:16	283:03		
Michael Picarella	285:03	286:07		
Michael Picarella	287:04	289:15		
Michael Picarella	289:19	290:18		
Michael Picarella	292:12	293:25		
Michael Picarella	297:08	297:11		
Michael Picarella	297:22	297:24		
Michael Picarella	298:20	299:18		
Michael Picarella	300:06	300:18		
Michael Picarella	301:18	304:09		
Michael Picarella	304:18	307:21		
Michael Picarella	308:25	309:10		
Michael Picarella	310:25	311:08		
Michael Picarella	311:14	314:08		
Michael Picarella	316:19	317:14		
Michael Picarella	318:09	319:14		
Michael Picarella	322:13	322:25		
Michael Picarella	323:15	323:19		
Michael Picarella	325:04	325:12		
Michael Picarella	326:15	327:03		
Michael Picarella	330:12	332:15		
Michael Picarella	332:22	333:22		
Michael Picarella	333:23	335:09		
Michael Picarella	337:04	337:21		
Michael Picarella	338:13	339:05		
Michael Picarella	343:03	343:09		
Michael Picarella	344:12	345:21		
Michael Picarella	347:25	348:04		
Michael Picarella	349:08	349:16		
Michael Picarella	350:10	355:03		
Michael Picarella	355:08	357:11		
Michael Picarella	357:23	359:06		
Michael Picarella	359:07	359:22		
Michael Picarella	360:14	360:19		
Michael Picarella	361:18	362:04		

<u>Deposition</u>	<u>Begin Designation</u>	<u>End Designation</u>	<u>Cross-Designations</u>	<u>Objections</u>
Michael Picarella	365:16	366:04		
Michael Picarella	372:18	373:19		
Michael Picarella	375:08	376:04		
Michael Picarella	376:05	376:22		
Michael Picarella	379:10	380:12		
Michael Picarella	380:13	381:06		
Michael Picarella	382:09	382:18		
Michael Picarella	383:03	383:13		
Michael Picarella	384:12	384:21		
Michael Picarella	385:23	387:04		
Michael Picarella	389:05	389:18		
Michael Picarella	389:25	390:13		
Michael Picarella	392:21	393:19		
Michael Picarella	396:03	396:13		
Michael Picarella	396:18	400:10		
Michael Picarella	401:16	401:22		
Michael Picarella	403:02	405:24		

## 9. EXHIBITS

Plaintiff's List of Exhibits is attached hereto as **Exhibit A**. Plaintiff reserves the right to use any of Defendant's exhibits at trial.

Defendant's List of Exhibits is attached hereto as **Exhibit B**. Defendant reserves the right to use any of Plaintiff's exhibits at trial.

## 10. STATEMENT OF DAMAGES CLAIMED

### A. Back Pay

Picarella estimates that he has incurred \$1,559,220.00 in back-pay damages through the anticipated December 5, 2016 commencement of trial, based upon HSBC's failure to promote him to the position of Head of Business Development (Americas), succeeding Eileen Hedges, in September 2012, and the termination of his employment on March 26, 2015. Picarella's back-pay damages are summarized in the chart below:

	2012	2013	2014	2015	2016
Compensation for Head of Bus. Dev. Am.	\$480,000	\$480,000	\$480,000	\$480,000	\$480,000
Compensation Actually Paid	\$282,000	\$282,000	\$225,000	\$51,780.00	\$0
Difference	\$198,000	\$198,000	255,000	\$428,220.00	\$480,000

Picarella's back pay damages amount to \$569,220 if based, alternatively, upon his \$282,000 earning capacity at HSBC before his compensation was reduced in 2015, and he was terminated in March of that year. Neither of these estimates include pre-judgment interest, to which Picarella is entitled.

HSBC objects to the inclusion of any discretionary pay raise or bonus(es) in Picarella's back pay damages claim. Should Picarella attempt to introduce any evidence relating to any damages based on discretionary pay raises or bonuses, HSBC objects to the evidence as contrary to a stipulation between the parties, and reserves the right to move to exclude the evidence at trial or in a pretrial motion *in limine*.

### **B. Front Pay**

HSBC's retaliatory conduct against Picarella has effectively destroyed his career in the financial services industry. Picarella is 49 years old, and planned to continue his career in the financial services industry until age 65, or an additional 16 years. His front pay damages equal his HSBC earning capacity as Head of Business Development (Americas) or comparable position (\$480,000) multiplied by the number of years the jury determines it will take for him to obtain comparable employment. The same calculation would be made if the jury were to apply his \$282,000 compensation rate at HSBC during 2012 and 2013 as his earning capacity to its front pay calculation.

HSBC objects to the inclusion of any discretionary pay raise or bonus(es) in Picarella's front pay damages claim. Should Picarella attempt to introduce any evidence relating to any damages based on discretionary pay raises or bonuses, HSBC objects to the evidence as contrary to a stipulation between the parties, and reserves the right to move to exclude the evidence at trial or in a pretrial motion *in limine*.

**C. Compensatory Damages**

Picarella estimates that he has suffered damages to his earning capacity based upon the reputational harm he has suffered as a result of his termination, and the accusations of poor performance and disclosure of confidential information falsely made against him by HSBC.

Garden variety damages for emotional distress are not subject to "calculation" but only determinable by the verdict of the jury.

**D. Punitive Damages**

Picarella seeks punitive damages under the Administrative Code of the City of New York, the New York State Human Rights Law, and Title VII of the Civil Rights Act of 1964, in an amount to be determined at the time of trial.

**E. Attorneys' Fees and Costs**

Picarella also seeks attorneys' fees and costs associated with bringing this action.

**11. UNANIMOUS VERDICT**

The parties do not consent to a less than unanimous verdict.

Respectfully submitted,

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**EXHIBIT A****Plaintiff's List of Exhibits**

<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
1	4/26/2010	Meeting Notes Hedges and Jang	HSBCPIC-RIST00002197	None
2	5/9/2011	Sametime Chat Patel and Hedges	HSBC-ST00004464	Relevance; Hearsay; Foundation
3	5/18/2011	Sametime Chat DeLuca and Doe	HSBCDLTDOC-00010583	Relevance; Hearsay; Foundation
4	5/23/2011	Sametime Chat Baldwin and Hedges	HSBC-ST00001931	Relevance; Hearsay; Foundation
5	6/7/2011	Sametime Chat Hedges and Doe	HSBCPIC00003504	Relevance; Hearsay; Foundation
6	6/21/2011	Sametime Chat Hedges and Picarella	HSBC-ST00003832	None
7	6/23/2011	Sametime Chat Picarella and Hedges	HSBC-ST00003825-3826	Relevance; Hearsay
8	6/24/2011	Sametime Chat Hedges and Picarella	HSBC-ST00003844	None
9	6/27/2011	Sametime Chat Picarella and Hedges	HSBC-ST00006001	Relevance; Hearsay; Foundation
10	7/7/2011	Sametime Chat Doe and DeLuca	HSBC-ST00000340	Relevance; Prejudicial
11	7/22/2011	Sametime Chat Doe and DeLuca	HSBC-ST00000179	Relevance; Hearsay
12	7/26/2011	Sametime Chat DeLuca and Doe	HSBC-ST00000186-187	Relevance; Hearsay; Foundation
13	7/28/2011	Sametime Chat White and Hedges	HSBC-ST00003616	Relevance; Hearsay; Foundation
14	8/7/2011	Sametime Chat Hedges and Picarella	HSBC-ST00003882	Relevance; Hearsay
15	8/9/2011	Sametime Chat Picarella and Hedges	HSBC-ST00003881	Hearsay
16	8/11/2011	Sametime Chat Doe and DeLuca	HSBC-ST00000082	Relevance; Hearsay
17	8/15/2011	Sametime Chat Hedges and Gottardi	HSBC-ST00002407-2408	Relevance; Hearsay; Foundation
18	8/16/2011	Sametime Chat DeLuca and Doe	HSBC-ST00000157-159	Relevance; Hearsay
19	8/17/2011	Mid-Year Manager Review	HSBCPIC00000095-99	None



<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
20	8/18/2011	Sametime Chat McNierney and Doe	HSBC-ST00000138	Relevance; Hearsay
21	8/23/2011	Sametime Chat Picarella and Hedges	HSBC-ST00003556	None
22	8/24/2011	Sametime Chat Murray and Rogers	HSBC-ST00007060	Relevance; Hearsay; Foundation
23	8/25/2011	Sametime Chat Hedges and Barino	HSBC-ST00002419	Relevance; Hearsay; Prejudicial
24	8/25/2011	Sametime Chat Barino and Hedges	HSBC-ST00002418	Relevance; Hearsay
25	9/6/2011	Sametime Chat Massey and Hedges	HSBC-ST00002416	Hearsay
26	9/7/2011	Sametime Chat Hedges and Barino	HSBC-ST00002298-2299	Relevance; Hearsay
27	9/8/2011	Sametime Chat Bottorff and Hedges	HSBC-ST00002312	Relevance; Hearsay
28	9/13/2011	Sametime Chat Picarella and Hedges	HSBC-ST00006097	Relevance; Hearsay; Foundation
29	9/16/2011	Sametime Chat Hedges and Picarella	HSBC-ST00003516	Relevance; Hearsay
30	9/23/2011	Sametime Chat DeLuca and Doe	HSBC-ST00000241	Relevance; Hearsay
31	9/26/2011	Sametime Chat DeLuca and Doe	HSBC-ST00000231	Relevance; Hearsay; Prejudicial; Foundation
32	9/26/2011	Sametime Chat DeLuca and Doe	HSBC-ST00000235	Relevance; Hearsay
33	10/4/2011	Sametime Chat Dalton and Hedges	HSBC-ST00002325	Relevance; Hearsay
34	10/6/2011	Sametime Chat Picarella and DeLuca	HSBC-ST00003954	Relevance; Hearsay
35	10/11/2011	Sametime Chat DeLuca and Doe	HSBC-ST00000675	Relevance; Hearsay; Foundation
36	10/11/2011	Sametime Chat DeLuca and Doe	HSBC-ST00000662-663	Relevance; Hearsay
37	10/11/2011	Sametime Chat Doe and DeLuca	HSBC-ST00000682	Relevance; Hearsay; Foundation
38	10/27/2011	Sametime Chat DeLuca and Doe	HSBC-ST00000812	Relevance; Hearsay; Foundation
39	10/31/2011	Sametime Chat Doe and DeLuca	HSBC-ST00000842-844	Hearsay
40	11/10/2011	Email Hedges to Baldwin	HSBCDLTDOC-00011476	Relevance; Hearsay

<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
41	11/11/2011	Email Hedges to Bottorff	HSBCDLTDOC-00011530-11531	Relevance; Hearsay
42	11/14/2011	Sametime Chat Hedges and Baldwin	HSBCDLTDOC-00021690	Relevance; Hearsay
43	11/14/2011	Sametime Chat Murray and Hedges	HSBC-ST00004936	Relevance; Hearsay
44	11/18/2011	Email Hedges to Havraniak	HSBCDLTDOC-00011595-11598	Relevance; Hearsay
45	12/1/2011	Sametime Chat Picarella and Rogers	HSBC-ST00003943	None
46	12/7/2011	Sametime Chat DeLuca and Doe	HSBC-ST00000541-542	None
47	12/15/2011	Sametime Chat Hedges and Jang	HSBC-ST00004860	Relevance; Prejudicial
48	12/16/2011	Email Picarella to Freer	Picarella000636-645	None
49	12/16/2011	Sametime Chat Hedges and Jang	HSBC-ST00002442	Relevance
50	12/21/2011	Year-End Manager Review	HSBCPIC00000106-107	None
51	12/21/2011	Year-End Manager Review	HSBCPIC00001914-1915	Duplicative
52	5/5/2011-12/31/2011	Year-End Self-Assessment	HSBCPIC00002003-2004	None
53	1/25/2012	Sametime Chat Doe and DeLuca	HSBCPIC00003506	Relevance; Hearsay
54	1/25/2012	Sametime Chat DeLuca and Doe	HSBCPIC00003508	Relevance; Hearsay; Prejudicial; Foundation
55	2/4/2012	Email Hedges to Doe	HSBCDLTDOC-00019126-19128	Relevance; Hearsay
56	2/7/2012	Email Hedges to Doe	HSBCDLTDOC-00019183-19184	Relevance; Hearsay
57	3/3/2012	Email Hedges to Weiss	HSBCDLTDOC-00011742	Relevance; Hearsay; Completeness
58	3/3/2012	Email Hedges to Weiss	HSBCDLTDOC-00011745-11746	Relevance; Hearsay
59	3/6/2012	Email Hedges to Calarco	HSBCDLTDOC-00011787-11788	Relevance; Hearsay
60	3/7/2012	Sametime Chat Hedges and Baldwin	HSBCDLTDOC-00021726	Relevance; Hearsay; Foundation
61	3/8/2012	Email Hedges to Weiss	HSBCDLTDOC-00011804-11805	Relevance; Hearsay

<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
62	3/14/2012	Sametime Chat Hedges and Doe	HSBCPIC00005064	None
63	4/2/2012	Sametime Chat Doe and Kaminsky	HSBCDLTDOC-00011245-11246	Relevance; Hearsay
64	4/2/2012	Email Hedges to Michael Picarella	HSBCPIC00000943	None
65	4/9/2012	Sametime Chat Hedges and Doe	HSBC-ST00003227	None
66	4/9/2012	Sametime Chat Hedges and Doe	HSBC-ST00003232	None
67	4/9/2012	Sametime Chat Hedges and White	HSBC-ST00003609	None
68	4/11/2012	Email Weiss to Weiss	HSBCPIC-RIST00001535	None
69	4/12/2012	Sametime Chat Hedges and Doe	HSBC-ST00003254	None
70	4/12/2012	Sametime Chat Hedges and Patel	HSBC-ST00001913	None
71	4/12/2012	Sametime Chat Hedges and Doe	HSBCDLTDOC-00011294	Relevance; Hearsay; Foundation
72	4/12/2012	Sametime Chat Hedges and Doe	HSBCDLTDOC-00011295	Relevance; Hearsay; Foundation
73	4/12/2012	Sametime Chat Hedges and Doe	HSBCDLTDOC-00011296	None
74	4/13/2012	Email Picarella to Weiss	HSBCPIC00007110	Completeness
75	4/13/2012	Email Weiss to Picarella	HSBCPIC00007113	None
76	4/16/2012	Sametime Chat Hedges and Jenner	HSBC-ST00001923	None
77	4/16/2012	Sametime Chat Doe and Hedges	HSBCDLTDOC-00011303	None
78	4/16/2012	Sametime Chat Doe and Eileen Hedges	HSBCDLTDOC-00011305	None
79	4/16/2012	Sametime Chat Carol Jenner and Smith	HSBC-ST00002695	Relevance; Hearsay; Foundation
80	4/16/2012	Sametime Chat Doe and Hedges	HSBC-ST00003248	None
81	4/16/2012	Email Weiss to Weiss	HSBCPIC-RIST00001444-1445	None
82	4/17/2012	Sametime Chat Doe and Hedges	HSBCDLTDOC-00011307	None
83	4/18/2012	Email Weiss to Weiss	HSBCPIC00007026	None

<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
84	4/19/2012	Email Picarella to Weiss	HSBCPIC00007128-7129	None
85	4/23/2012	Calendar Entry Notice	HSBCPIC00005234	None
86	4/25/2012	Sametime Chat Hedges and Doe	HSBC-ST00003085	Relevance; Hearsay
87	4/25/2012	Email Weiss to Weiss	HSBCPIC00001997	None
88	4/26/2012	Email Weiss to Picarella	HSBCPIC00001077	None
89	4/26/2012	Email Picarella to Weiss	HSBCPIC00001704-1705	None
90	4/27/2012	Sametime Chat Hedges and Baldwin	HSBC-ST00001835	Relevance; Hearsay; Foundation
91	4/30/2012	Calendar Entry Notice	HSBCPIC00004918	None
92	5/1/2012	Sametime Chat Hedges and Doe	HSBC-ST00005348	Relevance; Hearsay; Foundation
93	5/1/2012	Sametime Chat Doe and Hedges	HSBC-ST00003070	Relevance; Hearsay
94	5/3/2012	Sametime Chat Doe and DeLuca	HSBCDLTDOC-00010458	Relevance; Hearsay
95	5/7/2012	Email Hedges to Weiss	HSBCPIC-RIST00002290	Relevance; Hearsay; Completeness
96	5/7/2012	Email Hedges to Weiss	HSBCPIC-RIS00002291-2292	Relevance; Hearsay
97	5/7/2012	Email Jang to Weiss	HSBCPIC-RIST00002696	None
98	5/22/2012	Sametime Chat Hedges and DeRose	HSBC-ST00001868-1869	Relevance; Hearsay; Prejudicial
99	5/30/2012	Email Weiss to Weiss	HSBCPIC-RIST00002267-2268	None
100	5/31/2012	Email White to Hedges	HSBCPIC00007197	Relevance; Hearsay
101	5/31/2012	Email White to Hedges	HSBCDLTDOC-00012105-12106	Relevance; Hearsay
102	5/31/2012	Email Li to Weiss	HSBCPIC-RIST00002326	Relevance; Hearsay; Inadmissible per stipulation
103	5/31/2012	Sametime Chat Murray and Hedges	HSBCDLTDOC-00000022	Relevance; Hearsay; Foundation
104	5/31/2012	Sametime Chat Murray and Hedges	HSBC-ST00006960	Duplicative; Relevance; Hearsay; Foundation
105	5/31/2012	Sametime Chat Doe and Hedges	HSBC-ST00003133	Relevance; Hearsay

<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
106	6/1/2012	Sametime Chat Jenner and Hedges	HSBC-ST00001850	Relevance; Hearsay
107	6/15/2012	Email Hedges to Rogers	HSBCPIC00002821-2824	None
108	6/25/2012	Sametime Chat Saez and Hedges	HSBC-ST00002169	Relevance; Hearsay; Inadmissible per stipulation
109	6/25/2012	Email Weiss to Weiss	HSBCPIC-RIST00001196	None
110	6/26/2012	Sametime Chat Jenner and Hedges	HSBC-ST00002162	None
111	6/28/2012	Meeting notes	HSBCPIC-RIST00002204-2206	None
112	7/1/2012	Email Weiss to Weiss	HSBCPIC-RIST00001263-1264	None
113	7/1/2012	Email Picarella to Weiss	HSBCPIC00001702-1703	None
114	7/2/2012	Sametime Chat Jenner and White	HSBC-ST00003632	Relevance; Hearsay; Foundation
115	7/5/2012	Email Whang to Weiss	HSBCPIC-RIST00002327-2328	None
116	7/6/2012	Sametime Chat White and Jenner	HSBC-ST00003655	Relevance; Hearsay; Foundation
117	7/12/2012	Sametime Chat Jang and Whang	HSBC-ST00006835	Relevance; Hearsay
118	7/23/2012	Meeting Notes, Hedges and Jang	HSBCPIC-RIST00002200-2201	None
119	7/23/2012	Meeting Notes, Hedges and Jang	HSBCPIC-RIST00002198-2199	None
120	7/24/2012	Discussion Notes, Hedges and Jang	HSBCPIC-RIST00002202	None
121	7/25/2012	Email Weiss to Weiss	HSBCPIC00002005	None
122	7/26/2012	Email Picarella to Weiss	HSBCPIC-RIST00001030-1033	None
123	7/26/2012	Email Li to Weiss	HSBCPIC00002000-2004	None
124	7/30/2012	Email White to Park, Jang and Weiss	HSBCPIC-RIST00003186-3189	None
125	7/30/2012	Email Pizzimbono to Pizzimbono	HSBCPIC00006978	None
126	8/27/2012	Final Written Warning to Hedges	HSBCPIC-RIST00002203	None
127	8/31/2012	Email Li to Jang	HSBCPIC00001910-1922	Completeness
128	8/31/2012	Email Jang to Weiss	HSBCPIC00001923-1925	None

<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
129	8/2012	GB&M Suitability and Dodd-Frank	Picarella004820-4826	Best evidence; Relevance; Hearsay; Foundation
130	9/7/2012	Email Picarella to Pizzimbono	HSBCPIC00001538	None
131	9/10/2012	Email Whang to Weiss	HSBCPIC-RIST00002271-2272	Relevance; Hearsay; Prejudicial; Sensitive and confidential personnel information
132	9/11/2012	Email Weiss to White	HSBCPIC00001956 1957	Hearsay
133	9/11/2012	Email Picarella to Pizzimbono	HSBCPIC00007011	Relevance; Hearsay; Foundation
134	9/11/2012	Email Pizzimbono to White and Weiss	HSBCPIC00001937-1938	None
135	9/11/2012	Sametime Chat White and Hedges	HSBC-ST00003622	Relevance; Hearsay
136	9/12/2012	Email White to Weiss	HSBCPIC00001977-1979	Hearsay; Completeness
137	9/12/2012	Email White to Pizzimbono	HSBCPIC00006986	Relevance; Hearsay; Foundation
138	9/13/2012	Email White to Weiss	HSBCPIC-RIST00002252-2253	None
139	9/14/2012	Email White to Picarella	HSBCPIC00005144-5145	Completeness
140	9/14/2012	Sametime Chat White and Hedges	HSBC-ST00003625	Relevance; Hearsay; Foundation
141	9/18/2012	Email White to Picarella	HSBCPIC00001786-1788	None
142	9/18/2012	Email White to Picarella	HSBCPIC00001795-1797	None
143	9/18/2012	Email Picarella to Bilbrey	HSBCPIC00006315	Hearsay; Completeness
144	9/21/2012	Email Pak to Descamps, White, and Pizzimbono	HSBCPIC00001941 to HSBCPIC00001945	Relevance; Completeness
145	9/24/2012	Record of Investigation	HSBCPIC00012481-12486	None
146	9/24/2012	Mid-Year Manager Review	HSBCPIC00000100-105	None
147	9/26/2012	Sametime Chat Malanga and Kane	HSBC-ST00000062	Hearsay; Foundation

<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
148	10/2/2012	Malanga Notes, Picarella Meeting	HSBCPIC-RIST00003073-3077	Best evidence; Hearsay
149	10/2/2012	Email Picarella to Malanga	HSBCPIC052887-52889	None
150	10/3/2012	Picarella/Malanga Notes	HSBCPIC000000025	Best evidence; Hearsay; Completeness
151	10/4/2012	Email Malanga to Picarella	Picarella002429-2430	Best evidence; Hearsay
152	10/5/2012	Email White to Picarella	HSBCPIC00005146-5147	Completeness
153	10/5/2012	Email White to Picarella	HSBCPIC00001790-1794	None
154	10/9/2012	Email White to Feau	HSBCPIC00007204	Relevance; Hearsay; Completeness
155	10/9/2012	Email Malanga to Picarella	Picarella002483-2487	None
156	10/9/2012	Sametime Chat White and Jenner	HSBC-ST00003654	Relevance; Hearsay
157	10/10/2012	Email Weiss to Weiss	HSBCPIC-RIST00002269	Hearsay; Completeness; Privilege
158	10/10/2012	Email Weiss to Weiss	HSBCPIC-RIST00002275	Hearsay; Privilege
159	10/11/2012	Email Picarella to Bilbrey, Malanga, and Harmon	HSBCPIC00000001-9	None
160	10/12/2012	Sametime Chat Jenner and White	HSBC-ST00006886	Relevance; Hearsay; Completeness
161	10/25/2012	Email Hatem to Malanga	HSBCPIC-RIST00000586-587	Hearsay; Completeness
162	12/11/2012	Email Weiss to Weiss	HSBCPIC-RIST00002322	Relevance; Hearsay; Privilege
163	12/18/2012	Email Picarella to White	HSBCPIC00002319-2325	None
164	1/16/2013	Email Picarella to Bilbrey	HSBCPIC00004943	None
165	1/17/2013	Email Picarella to Bilbrey	HSBCPIC00004944	None
166	1/18/2013	Email Picarella to Bilbrey	Picarella002836	Completeness



<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
167	1/23/2013	Email Whang to Weiss	HSBCPIC-RIST00002283-2284	Relevance; Hearsay; Sensitive and confidential personnel information
168	1/30/2013	Email Doernberg to Jenner and White	HSBCPIC00006692	Hearsay
169	2/5/2013	Sametime Chat Sparks and Jenner	HSBC-ST00001595	Relevance; Hearsay
170	2/7/2013	Email Anthony to Jenner	HSBCPIC00006520-6521	Hearsay
171	2/8/2013	Email O'Leary to Jenner	HSBCPIC00006529	Hearsay
172	2/10/2013	Email Wilens to Jenner	HSBCPIC00006526-6527	Hearsay
173	2/11/2013	Email Bliss to Jenner	HSBCPIC00006528	Hearsay
174	2/11/2013	Email Valdes to Jenner	HSBCPIC00006522	Hearsay
175	2/12/2013	Email Picarella to Pizzimbono	HSBCPIC-RIST00002258-2260	Hearsay; Completeness
176	2/12/2013	Email Nicotra to Jenner	HSBCPIC00006523-6525	Hearsay
177	2/13/2013	Email Peison to Jenner	HSBCPIC00006536	None
178	2/13/2013	Email Picarella to Brady	HSBCPIC00004456-4459	Hearsay
179	2/13/2013	Email Lashmet to Jenner	HSBCPIC00006535	Hearsay
180	2/25/2013	Email Park to White	HSBCPIC00007316-7317	None
181	2/27/2013	Email Park to White	HSBCPIC00007314	Hearsay
182	3/5/2013	Email Park to Weiss	HSBCPIC00023530-23531	None
183	3/20/2013	Email Bilbrey to Picarella	HSBCPIC00012859-12860	None
184	3/2013	Organizational Charts	HSBCPIC-RIST00000537-562	None
185	4/22/2013	Email Jong to Weiss; Park, Whang, Hunter, and Pak	HSBCPIC-RIST00003252-3254	Relevance; Hearsay; Sensitive and confidential personnel information
186	4/23/2013	Email Picarella to Pizzimbono	HSBCPIC00005068-5069	Hearsay; Completeness
187	4/24/2013	Email Picarella to Picarella	HSBCPIC00003183 3184	Authenticity; Foundation
188	4/30/2013	Email Montgomerie to Weiss	HSBCPIC00007073	Relevance; Hearsay



<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
189	5/8/2013	Email Karam to Pizzimbono	HSBCPIC00001946-1949	Relevance; Hearsay
190	5/13/2013	Year-End Manager Review	HSBCPIC00000108-114	None
191	5/21/2013	Sametime Chat Jenner and Karam	HSBC-ST00001614-1617	None
192	5/23/2013	Sametime Chat Karam and Jenner	HSBC-ST00002748	Relevance; Hearsay
193	6/7/2013	Sametime Chat Jenner and Karam	HSBC-ST00001575	None
194	6/25/2013	Email Levelis to Pizzimbono	HSBCPIC00023369-23371	Relevance; Hearsay
195	7/2/2013	Sametime Chat Karam and Jenner	HSBC-ST00001567-1568	None
196	7/2/2013	Sametime Chat Karam and Jenner	HSBC-ST00001567-1568	Hearsay; Foundation
197	7/11/2013	Email Karam to White	HSBCPIC00005024	Hearsay
198	8/8/2013	Email Karam to Picarella	HSBCPIC00005035-5036	Completeness
199	9/18/2013	Sametime Chat Jenner and Karam	HSBC-ST00001576	Relevance; Hearsay
200	9/18/2013	Email Karam to White	HSBCPIC00022487-22492	None
201	9/18/2013	Email White to Karam	HSBCPIC00005857-5863	None
202	9/19/2013	Sametime Chat Jenner and Karam	HSBC-ST00002596-2598	None
203	9/19/2013	Sametime Chat Karam and Edelman	HSBC-ST00002761-2762	Relevance; Hearsay; Prejudicial; Foundation
204	9/23/2013	Email Karam to Picarella	HSBCPIC00004954-4958	None
205	9/23/2013	Email Picarella to Bilbrey and Alderoty	HSBCPIC00004945-4953	None
206	9/27/2013	Email Karam to Picarella	HSBCPIC00004965-4973	None
207	10/2/2013	Sametime Chat Karam and Jenner	HSBC-ST00001582	Relevance; Hearsay; Foundation
208	10/11/2013	Sametime Chat Long and Karam	HSBC-ST00001651	Relevance; Hearsay
209	10/17/2013	Email Rose to Karam	HSBCPIC00005884-5886	Relevance; Hearsay
210	11/25/2013	Email Picarella to Bilbrey	HSBCPIC00001727	None

<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
211	12/10/2013	Mid-Year Manager Review	HSBCPIC00000122-126	None
212	1/8/2014	Email Karam to Picarella	HSBCPIC00001156-1167	None
213	1/27/2014	Email Pizzimbono to Picarella	HSBCPIC00002590-2591	None
214	1/29/2014	Email Karam to Karam and Kartik	HSBCPIC00006016-6026	Relevance; Hearsay; Foundation
215	2/25/2014	Email Picarella to Karam	HSBCPIC00001522-1528	None
216	3/14/2014	Email Jang to Weiss, Park, Whang, Reid, and Li	HSBCPIC-RIST00002281	Relevance; Hearsay; Sensitive and confidential personnel information
217	4/14/2014	Email Georgs to Karam	HSBCPIC00002704-2707	Hearsay
218	5/2/2014	Email Picarella to Karam	HSBCPIC00002244-2250	None
219	5/14/2014	Email Jang to Weiss, Park, and Whang	HSBCPIC00007072	Sensitive and confidential personnel information
220	5/16/2014	Year-End Manager Review	HSBCPIC00000127-130	None
221	5/23/2014	Email Karam to Picarella	HSBCPIC00005079	None
222	6/10/2014	Email Picarella to Picarella	HSBCPIC00004549-4553	Completeness
223	11/2011-6/2014	Monthly Calendars	PICARELLA001829-1911	Best evidence; Authenticity; Hearsay
224	8/19/2014	Email Weiss to Weiss	HSBCPIC00002572-2573	None
225	9/24/2014	Email Picarella to Karam	HSBCPIC00006172-6173	Completeness
226	10/6/2014	Email Picarella to Karam	HSBCPIC00006209-6212	Completeness
227	10/8/2014	Email Karam to Picarella	HSBCPIC00002451-2456	Completeness
228	10/8/2014	Email Picarella to Karam	HSBCPIC00002444-2450	Completeness
229	10/10/2014	Email Picarella to Karam and Malanga	HSBCPIC00006189-6191	Completeness

<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
230	10/15/2014	Email Malanga to Picarella	HSBCPIC00002496-2499	None
231	10/20/2014	Email Picarella to Bilbrey	HSBCPIC00002278-2284	Completeness
232	11/17/2014	Email Picarella to Karam	HSBCPIC00002598-2608	Completeness
233	11/20/2014	Email Li to Weiss	HSBCPIC00007151	Relevance; Hearsay
234	11/21/2014	Email Picarella to Karam	HSBCPIC00006975	Completeness
235	11/21/2014	Mid-Year Manager Review	HSBCPIC00000079-85	None
236	11/22/2014	Mid-Year Review 2014	HSBCPIC00000115-121	None
237	11/24/2014	Email Picarella to Bilbrey	HSBCPIC00004984	None
238	11/24/2014	Email Picarella to Bilbrey	HSBCPIC00006977	None
239	11/25/2014	Record of Investigation	HSBCPIC00005457-5458	None
240	11/26/2014	Email Picarella to Picarella	Picarella005545-5564	Hearsay
241	11/26/2014	Email Malanga to Picarella	HSBCPIC00004985-4987	None
242	12/1/2014	Email Picarella to Bilbrey and Malanga	HSBCPIC000074657 467	None
243	1/12/2015	Record of Investigation	HSBCPIC00005453-5456	None
244	1/15/2015	Letter Marshall to Hubbard	Exhibit 1, Deposition of Roskell	None
245	2/11/2015	NY Post article: "HSBC singles out worker for leaks: sources"	None	None
246	3/31/2015	Kutas Memorandum re: NY Post Inquiry	HSBCPIC00005260-5263	None
247	3/26/2015	Letter Roskell to Picarella	HSBCPIC00005259	None
248	5/1/2011	HSBC US Employee Handbook	HSBCPIC-RIST00000033-150	None
249	5/5/2011	Role Profile – Michael W. Picarella	Picarella000670-675	None
250	5/5/2011	Role Profile – Eileen F. Hedges	Picarella000676-681	None
251	10/14/2011	Sametime Chat DeLuca and Doe	HSBC-ST00000171-172	Relevance, Hearsay, Foundation

<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
252	2/6/2012	Email Picarella to Hedges	Picarella000781	Authenticity; Best evidence; Completeness; Relevance; Hearsay
253	2/28/2012	Email Picarella to Hedges	Picarella000794	Authenticity; Best evidence; Completeness; Relevance; Hearsay
254	8/9/2012	Email Picarella to Pizzimbono	Picarella000917-919	Authenticity; Best evidence; Completeness; Relevance; Hearsay
255	8/15/2012	Email Picarella to Pizzimbono	Picarella000931-932	Authenticity; Best evidence; Completeness; Relevance; Hearsay
256	9/4/2012	Email Picarella to Pizzimbono	Picarella000933	Authenticity; Best evidence; Completeness; Relevance; Hearsay
257	9/6/2012	Email Picarella to Pizzimbono	Picarella000934-940	Authenticity; Best evidence; Completeness; Relevance; Hearsay
258	9/11/2012	Email Picarella to Pizzimbono	Picarella000965	Authenticity; Best evidence; Completeness; Relevance; Hearsay
259	9/12/2012	Email Picarella to Pizzimbono and White	Picarella000966-967	Authenticity; Best evidence; Completeness
260	9/12/2012	Email Picarella to Hedges	Picarella000968-970	Authenticity; Best evidence; Completeness; Relevance; Hearsay
261	9/14/2012	Email Picarella to White and Pizzimbono	Picarella000971	Authenticity; Best evidence; Completeness
262	9/19/2012	Email Picarella to Jenner	Picarella000994-995	Authenticity; Best evidence; Completeness; Relevance; Hearsay

<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
263	9/20/2012	Email Picarella to Bilbrey	Picarella001000-1001	Authenticity; Best evidence; Completeness; Hearsay
264	9/25/2012	Email Picarella to Agonis	Picaerlla001009-1011	Authenticity; Best evidence; Completeness; Relevance; Hearsay
265	10/5/2012	Email Picarella to Jenner and White	Picarella001033-1034	Authenticity; Best evidence; Completeness
266	10/11/2012	Email Picarella to Feau and Temkim	Picarella001035-1037	Authenticity; Best evidence; Completeness; Relevance; Hearsay
267	10/22/2012	Email Picarella to Jenner	Picarella001056	Authenticity; Best evidence; Completeness; Relevance; Hearsay
268	10/22/2012	Email Picarella to Jenner	Picarella001057-1058	Authenticity; Best evidence; Completeness; Relevance; Hearsay
269	10/23/2012	Email Picarella to Jenner	Picarella001059-1060	Authenticity; Best evidence; Completeness; Relevance; Hearsay
270	10/24/2012	Email Picarella to Jenner	Picarella001061-1062	Authenticity; Best evidence; Completeness; Relevance; Hearsay
271	11/13/2012	Email Picarella to Jenner	Picarella001069-1074	Authenticity; Best evidence; Completeness; Relevance; Hearsay
272	11/15/2012	Email Picarella to Jenner	Picarella001077-1079	Authenticity; Best evidence; Completeness; Relevance; Hearsay
273	11/27/2012	Email Picarella to White	Picarella001083-1095	Authenticity; Best evidence; Completeness

<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
274	11/27/2012	Email Picarella to Bilbrey	Picarella001144-1147	Authenticity; Best evidence; Completeness
275	12/13/2012	Email Picarella to Jenner	Picarella001156	Authenticity; Best evidence; Completeness; Relevance; Hearsay
276	12/17/2012	Email Picarella to Jenner and Brady	Picarella001159	Authenticity; Best evidence; Completeness; Relevance; Hearsay
277	1/25/2013	Email Picarella to Jenner	Picarella001203-1204	Authenticity; Best evidence; Completeness; Relevance; Hearsay
278	1/29/2013	Email Picarella to Jenner	Picarella001215-1218	Authenticity; Best evidence; Completeness; Relevance; Hearsay
279	3/6/2013	Cancelled: Weekly Catch-up	Picarella001264	Authenticity; Best evidence; Completeness; Relevance; Hearsay
280	3/7/2013	Cancelled: Suitability Working Group Meeting	Picarella001265	Authenticity; Best evidence; Completeness; Relevance; Hearsay
281	3/25/2013	Update: Americas Dispensation Review Committee (DRC) weekly	Picarella001279	Authenticity; Best evidence; Completeness; Relevance; Hearsay
282	4/9/2013	GM Business Case Prioritization Meeting	Picarella001286	Authenticity; Best evidence; Completeness; Relevance; Hearsay
283	4/12/2013	Email Picarella to Brady	Picarella001297-1298	Authenticity; Best evidence; Completeness; Relevance; Hearsay
284	4/17/2013	Email Picarella to Jenner	Picarella001300-1302	Authenticity; Best evidence; Completeness; Relevance; Hearsay

<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
285	4/22/2013	Email Jenner to Picarella	Picarella001309-1310	Authenticity; Best evidence; Completeness; Relevance; Hearsay
286	4/24/2013	Email Picarella to Bilbrey	Picarella001330	Authenticity; Best evidence; Completeness; Relevance; Hearsay
287	4/24/2013	Email Picarella to Picarella	Picarella001331	Authenticity; Best evidence; Completeness; Hearsay
288	5/1/2013	Cancelled: year end discussion	Picarella001393	Authenticity; Best evidence; Completeness; Relevance; Hearsay
289	5/6/2013	Email Jenner to White	Picarella001436-1437	Authenticity; Best evidence; Completeness; Relevance; Hearsay
290	8/7/2013	Email Picarella to Karam	Picarella001501-1503	Authenticity; Best evidence; Completeness; Hearsay
291	8/8/2013	Email Karam to Picarella	Picarella001504	Authenticity; Best evidence; Completeness
292	10/31/2013	Email Picarella to Bilbrey	Picarella001635	Authenticity; Best evidence; Completeness; Hearsay
293	12/11/2013	Email Picarella to Pizzimbono	Picarella001652-1654	Authenticity; Best evidence; Completeness; Relevance; Hearsay
294	12/11/2013	Email Picarella to Pizzimbono	Picarella001666-1667	Authenticity; Best evidence; Completeness; Relevance; Hearsay
295	12/20/2013	Email Picarella to Karam	Picarella001679-1681	Authenticity; Best evidence; Completeness; Relevance; Hearsay

<b>Pl. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
296	12/20/2013	Email Karam to Picarella	Picarella001686-1687	Authenticity; Best evidence; Completeness; Hearsay
297	1/8/2014	Email Karam to Picarella	Picarella001694-1695	Authenticity; Best evidence; Completeness; Hearsay
298	1/8/2014	Email Picarella to Bilbrey	Picarella001707-1708	Authenticity; Best evidence; Completeness; Hearsay
299		Michael Picarella's Resume	Picarella000686-687	Hearsay
300		Composite, Mitigation Documents	Picarella007082-9070	Authenticity; Compound; Hearsay; Foundation
301		Mitigation Log	Picarella009071-9086	Foundation; Hearsay; Best evidence



**EXHIBIT B****Defendant's Exhibit List**

<b>Def. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
1	2009	2009 Year-End Downward Appraisal of M. Picarella	BARC_000007 - BARC_000013	Relevance (FRE 401); Prejudice (FRE 403); Character Evidence (FRE 404); Hearsay (FRE 802)
2	2010	2010 Mid-Year Downward Appraisal of M. Picarella	BARC_000014 - BARC_000018	Relevance (FRE 401); Prejudicial (FRE 403); Character Evidence (FRE 404); Hearsay (FRE 802)
3	4/7/2011	Email from M. Picarella (yahoo account) to S. Jang re Re: Hello with attachment - Barclays pay stub 3.31.2011	Picarella005297 - Picarella005298	Relevance (FRE 401)
4	4/13/2011	Offer Letter from HSBC to M. Picarella	HSBCPIC00000031 - HSBCPIC00000034	None
5	4/14/2011	Employment Withdrawal from Barclays - M. Picarella	BARC_000024	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403); Character Evidence (FRE 404)
6	5/1/2011	HSBC US Employee Handbook	HSBCPIC-RIST00000033 - HSBCPIC-RIST00000150	None
7	5/24/2011	Sametime chat between E. Hedges and M. Picarella	HSBC-ST00003432	Hearsay (FRE 802); Relevance (FRE 401)
8	6/3/2011	Sametime chat between E. Hedges and M. Picarella	HSBC-ST00003792	Relevance (FRE 401); Prejudice (FRE 403)
9	6/10/2011	Sametime chat between M. Picarella and E. Hedges	HSBC-ST00003771	Relevance (FRE 401)
10	6/10/2011	Sametime chat between E. Hedges and M. Picarella	HSBC-ST00003770	Relevance (FRE 401)
11	6/14/2011	Sametime chat between M. Picarella and E. Hedges	HSBC-ST00003788	Relevance (FRE 401)
12	6/17/2011	M. Picarella HSBC Mid-Year Manager Review	HSBCPIC00000095 - HSBCPIC00000099	None

<b>Def. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
13	6/21/2011	Sametime chat between M. Picarella and E. Hedges	HSBC-ST00003832	None
14	6/22/2011	Sametime chat between M. Picarella and E. Hedges	HSBC-ST00003828	Relevance (FRE 401)
15	6/23/2011	Sametime chat between M. Picarella and E. Hedges	HSBC-ST00003824	Relevance (FRE 401)
16	6/23/2011	Sametime chat between E. Hedges and M. Picarella	HSBC-ST00003823	Relevance (FRE 401)
17	6/23/2011	Sametime chat between E. Hedges and M. Picarella	HSBC-ST00003822	Relevance (FRE 401)
18	6/23/2011	Sametime chat between M. Picarella and E. Hedges	HSBC-ST00003821	Relevance (FRE 401)
19	6/30/2011	Sametime chat between E. Hedges and M. Picarella	HSBC-ST00003848	Relevance (FRE 401)
20	7/8/2011	Sametime chat between E. Hedges and M. Picarella	HSBC-ST00003796	Relevance (FRE 401)
21	7/8/2011	Sametime chat between E. Hedges and M. Picarella	HSBC-ST00003797 - HSBC-ST00003798	Relevance (FRE 401)
22	7/14/2011	Sametime chat between E. Hedges and M. Picarella	HSBC-ST00003790	Relevance (FRE 401)
23	7/20/2011	Sametime Chat between J. Doe and E. Hedges	HSBC-ST00000358	Hearsay (FRE 802); Relevance (FRE 401)
24	7/20/2011	Sametime chat between J. Doe and C. DeLuca	HSBC-ST00001487	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
25	8/5/2011	Sametime chat between E. Hedges and M. Picarella	HSBC-ST00003877	Relevance (FRE 401)
26	8/8/2011	Sametime chat between M. Picarella and E. Hedges	HSBC-ST00003883	None
27	8/11/2011	Sametime chat between E. Hedges and M. Picarella	HSBC-ST00003870	Relevance (FRE 401)
28	8/19/2011	Sametime chat between J. Doe and E. Hedges	HSBCDLTDOC-00010717	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
29	8/23/2011	Sametime chat between E. Hedges and M. Picarella	HSBC-ST00003886	None

<b>Def. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
30	8/23/2011	Email from M. Picarella to J. Lodato	HSBCPIC00005148- HSBCPIC00005149	None
31	9/14/2011	Sametime Chat between E. Hedges and J. Doe	HSBCPIC00005038	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
32	10/6/2011	Sametime chat between C. DeLuca and M. Picarella	HSBC-ST00003962	None
33	10/7/2011	Sametime chat between E. Hedges and M. Picarella	HSBC-ST00003963	Relevance (FRE 401)
34	10/13/2011	Sametime chat between J. Doe and C. DeLuca	HSBCPIC00005039 - HSBCPIC00005040	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
35	10/19/2011	Sametime chat between M. Rogers and M. Picarella	HSBC-ST00003980	Relevance (FRE 401); Prejudice (FRE 403)
36	10/21/2011	Sametime chat between M. Picarella and E. Hedges	HSBC-ST00003982	Relevance (FRE 401)
37	10/21/2011	Sametime chat between M. Picarella and E. Hedges	HSBC-ST00003977	Hearsay (FRE 802); Relevance (FRE 401)
38	10/21/2011	Sametime chat between M. Rogers and M. Picarella	HSBC-ST00003976	Relevance (FRE 401); Prejudice (FRE 403)
39	10/21/2011	Sametime chat between M. Picarella and M. Murray	HSBC-ST00003983	None
40	10/21/2011	Sametime chat between M. Picarella and M. Rogers	HSBC-ST00003984	Relevance (FRE 401)
41	10/27/2011	Sametime chat between M. Rogers and M. Picarella	HSBC-ST00003973	None
42	10/27/2011	Sametime chat between M. Rogers and M. Picarella	HSBC-ST00003966	None
43	10/28/2011	Sametime chat between M. Rogers and M. Picarella	HSBC-ST00003971	Relevance (FRE 401)
44	10/28/2011	Sametime chat between M. Rogers and M. Picarella	HSBC-ST00003970	Relevance (FRE 401)

<b>Def. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
45	11/2/2011	Sametime chat between M. Rogers and M. Picarella	HSBC-ST00003974 - HSBC- ST00003975	Relevance (FRE 401)
46	11/3/2011	Sametime chat between M. Rogers and M. Picarella	HSBC-ST00003950	Relevance (FRE 401)
47	11/3/2011	Sametime chat between M. Picarella and M. Rogers	HSBC-ST00003898	Relevance (FRE 401)
48	11/3/2011	Sametime chat between M. Picarella and M. Rogers	HSBC-ST00003897	Relevance (FRE 401)
49	11/3/2011	Sametime chat between M. Picarella and M. Rogers	HSBC-ST00003894	Relevance (FRE 401)
50	11/4/2011	Sametime chat between M. Picarella and E. Hedges	HSBC-ST00006274	Relevance (FRE 401); Prejudice (FRE 403)
51	11/8/2011	Sametime Chat between E. Hedges and J. Doe	HSBCDLTDOC-00021643	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
52	11/9/2011	Sametime chat between M. Rogers and M. Picarella	HSBC-ST00003899	Relevance (FRE 401)
53	11/9/2011	Sametime chat between M. Picarella and M. Rogers	HSBC-ST00003914	None
54	11/9/2011	Sametime chat between M. Rogers and M. Picarella	HSBC-ST00003913	Relevance (FRE 401)
55	11/9/2011	Sametime chat between M. Picarella and M. Rogers	HSBC-ST00003912	None
56	11/10/2011	Sametime chat between M. Rogers and M. Picarella	HSBC-ST00003917	Relevance (FRE 401)
57	11/15/2011	Email from J. Doe to J. Carlone re Re: Sales Compliance Review - Org Chart	HSBCDLTDOC-00012424 - HSBCDLTDOC-00012426	Hearsay (FRE 802); Relevance (FRE 401)

<b>Def. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
58	11/15/2011	Sametime chat between M. Picarella and E. Hedges	HSBC-ST00003888	None
59	11/16/2011	Sametime chat between J. Doe and E. Hedges	HSBCPIC-RIST00003801	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
60	11/22/2011	Sametime Chat between E. Hedges and J. Doe	HSBC-ST00000445	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
61	11/22/2011	Sametime Chat between J. Doe and E. Hedges	HSBC-ST00001528	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
62	11/22/2011	Sametime Chat between J. Doe and E. Hedges	HSBC-ST00000444	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
63	11/22/2011	Sametime Chat between J. Doe and E. Hedges	HSBC-ST00007220	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
64	11/22/2011	Sametime Chat between M. Picarella and J. McNierney	HSBC-ST00006182	Relevance (FRE 401); Hearsay (FRE 802)
65	11/29/2011	Email from S. White to E. Hedges re Topaz Escalation	HSBCPIC00052008	Hearsay (FRE 802)
66	11/30/2011	Sametime chat between M. Picarella and M. Rogers	HSBC-ST00003940	Relevance (FRE 401)
67	11/30/2011	Sametime chat between M. Picarella and M. Rogers	HSBC-ST00003939	Relevance (FRE 401)
68	12/1/2011	Sametime Chat between J. Doe and E. Hedges	HSBCPIC00005045 - 00005046	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
69	12/1/2011	Sametime Chat between E. Hedges and J. Doe	HSBC-ST00000410	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
70	12/1/2011	Sametime chat between E. Hedges and M. Picarella	HSBC-ST00003941 - HSBC- ST00003942	Relevance (FRE 401)
71	12/6/2011	Sametime chat between J. Doe and C. DeLuca	HSBCPIC00005047 - HSBCPIC00005050	Hearsay (FRE 802); Prejudice (FRE 403); Relevance (FRE 401)

Def. Ex. #	Date	Description	Bates Number	Objection
72	12/6/2011	Email from M. Picarella (yahoo account) re Yesterday Eileen told me that I should expect a zero bonus...	Picarella000419	None
73	12/7/2011	Sametime Chat between J. Doe and E. Hedges	HSBCPIC00005051	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
74	12/7/2011	Sametime chat between J. Doe and C. DeLuca	HSBCPIC00005052 - HSBCPIC00005053	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
75	12/8/2011	Sametime chat between J. Doe and C. DeLuca	HSBCPIC00005054	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
76	12/8/2011	Sametime chat between J. Doe and C. DeLuca	HSBCPIC00005056	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
77	12/8/2011	Sametime chat between J. Doe and C. DeLuca	HSBCDLTDOC-00011009	None
78	12/15/2011	Sametime chat between J. Doe and E. Hedges	HSBC-ST00000475	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
79	12/15/2011	Sametime chat between E. Hedges and K. Patel	HSBC-ST00004857- HSBC-ST00004858	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
80	12/16/2011	Email from M. Picarella (yahoo account) to K. Freer re Fwd: michael	Picarella000636 - Picarella000645	None
81	12/19/2011	Sametime chat between E. Hedges and C. Baldwin	HSBC-ST00002434	Hearsay (FRE 802); Prejudice (FRE 403)
82	12/21/2011	Email from PowerMail Manager to K. Vogel et al re New Appointment - Chief Operating Officer, Global Markets, Americas	HSBCPIC00051934 - HSBCPIC00051396	Relevance (FRE 401)
83	12/21/2011	Sametime Chat between J. Doe and C. DeLuca	HSBC-ST00000517 - HSBC-ST00000518	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
84	12/21/2011	Sametime chat between M. Rogers and M. Picarella	HSBC-ST00003928	Relevance (FRE 401); Prejudice (FRE 403)

<b>Def. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
85	12/21/2011	M. Picarella HSBC Year End Review (2011)	HSBCPIC00000106 - 00000107	None
86	1/4/2012	Sametime chat between J. Doe and C. DeLuca	HSBC-ST00005339	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
87	1/4/2012	Sametime chat between J. Doe and E. Hedges	HSBCDLTDOC-00011088 - HSBCDLTDOC-00011089	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
88	1/11/2012	Sametime Chat between J. Doe and E. Hedges	HSBC-ST00003065	Hearsay (FRE 802); Relevance (FRE 401)
89	1/18/2012	Sametime Chat between J. Doe and E. Hedges	HSBCPIC00005055	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
90	1/23/2012	Sametime chat between M. Rogers and M. Picarella	HSBC-ST00003743	Relevance (FRE 401)
91	1/23/2012	Sametime chat between M. Picarella and M. Rogers	HSBC-ST00003744	Relevance (FRE 401)
92	1/24/2012	Sametime Chat between M. Murray and M. Picarella	HSBC-ST00003745	Relevance (FRE 401)
93	2/1/2012	2011/2012 HSBC Pay Review Statement - M. Picarella	HSBCPIC00005199 - HSBCPIC00005200	None
94	2/1/2012	E. Hedges HSBC 2011/2012 Pay Review Statement	HSBCPIC00005197 - HSBCPIC00005198	None
95	2/1/2012	C. Jenner HSBC 2011/2012 Pay Review Statement	HSBCPIC00005195 - HSBCPIC00005196	None
96	2/1/2012	C. Semetulsakis Year End Review	HSBCPIC00012647 - HSBCPIC00012652	None
97	2/7/2012	Sametime Chat between E. Hedges and M.J. Rogers	HSBC-ST00004227	Hearsay (FRE 802)
98	2/7/2012	Email from K. Freer to M. Picarella (yahoo account) re RE: Confirming HSBC-Interview details	Picarella002172 - Picarella002174	None



Def. Ex. #	Date	Description	Bates Number	Objection
99	2/7/2012	Sametime Chat between J. Doe and C. DeLuca	HSBCPIC00005059 - HSBCPIC00005060	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
100	2/8/2012	Email from M. Picarella to J. Rist re Test... New Group Email for the Hedge Fund Focus Group	HSBCRIST00005413- HSBCRIST00005415	Relevance (FRE 401)
101	2/9/2012	Sametime chat between M. Picarella and E. Hedges	HSBC-ST00003740	Relevance (FRE 401)
102	2/13/2012	Email from J. Doe to E. Hedges re: hi	HSBCDLTDOC-00019773	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
103	2/14/2012	Email from J. Doe to C. DeLuca re Re: hi	HSBCPIC00003528 - HSBCPIC00003531	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
104	2/14/2012	Email from S. Hooker to M. Picarella re CDG NY Portfolio as of 13 Feb 2012 – Weekly Update	HSBCPIC00052012- HSBCPIC00052015	None
105	3/2/2012	Sametime Chat between C. DeLuca and J. Doe	HSBC-ST00005327	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
106	3/7/2012	Sametime chat between J. Doe and E. Hedges	HSBCDLTDOC-00021724	Hearsay (FRE 802); Relevance (FRE 401)
107	3/7/2012	Sametime chat between J. Doe and C. DeLuca	HSBCPIC000050262	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
108	3/9/2012	Email from P. Brady to M. Picarella re Re: I have a quality person if you'd like to meet for future considerations?	HSBCPIC00004992	None
109	3/12/2012	Sametime Chat between C. DeLuca and J. Doe	HSBCDLTDOC-00010374- HSBCDLTDOC-00010378	Hearsay (FRE 802); Relevance (FRE 401)
110	3/14/2012	Sametime chat between J. Doe and E. Hedges	HSBCDLTDOC-00021747 (also HEDGES_EILEEN-00002968)	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
111	3/14/2012	Sametime Chat between S. White and E. Hedges	HSBC-ST00003597	Hearsay (FRE 802)



Def. Ex. #	Date	Description	Bates Number	Objection
112	3/14/2012	Email from S. White to M. Picarella	HSBCDLTDOC-00011845- HSBCDLTDOC-00011851	None
113	3/14/2012	Email from S. White to M. Picarella re Pimco HBEU Repo Process Flow	HSBCPIC00023587- HSBCPIC00023590	None
114	3/16/2012	Sametime Chat between M. Li and E. Hedges	HSBCDLTDOC-00021750	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
115	3/19/2012	Email from M. Farucci to M. Picarella re Fw: Fw: Updated Resume	HSBCPIC00004993 - HSBCPIC00004998	Relevance (FRE 401)
116	3/20/2012	Sametime Chat between C. DeLuca and J. Doe	HSBCDLTDOC-00010402	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
117	3/20/2012	Sametime Chat between J. Doe and C. DeLuca	HSBCDLTDOC-00010418	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
118	3/20/2012	Sametime Chat between C. DeLuca and J. Doe	HSBC-ST00005599- HSBC-ST00005600	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
119	3/21/2012	Email from J. Doe to E. Hedges re Re: Rescheduled: Americas Sales Technology Update - VC Details attached (3 Apr 09:00 EDT in Level 4 Room 1)	HSBCPIC00001805 - HSBCPIC00001812	Relevance (FRE 401); Prejudice (FRE 403)
120	3/23/2012	Sametime Chat between J. Doe and E. Hedges	HSBC-ST00005700	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
121	4/2/2012	Email from E. Hedges to M. Picarella Re: Today's Meeting	HSBCPIC00000943	None
122	4/2/2012	Email from M. Picarella to E. Hedges re Re: Today's Meeting	HSBCPIC00001214 - HSBCPIC00001215	None
123	4/2/2012	Sametime Chat between E. Hedges and M. Rogers	HSBC-ST00004379- HSBC-ST00004380	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)

Def. Ex. #	Date	Description	Bates Number	Objection
124	4/3/2012	Sametime Chat between E. Hedges and J. Doe	HSBC-ST00003262	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
125	4/9/2012	Email from S. White to M. Picarella cc C. Pizzimbono, C. Heusler, E. Norton, E. Hedges, G. Coles, J. Lindon, K. Sheffield, L. Karp, M. Molynas-Drazal, M. Maciak, N. Taylor, P. Gomez, P. Brady, S. Boras re Re: RM Identification Project	HSBCPIC00004988 - HSBCPIC00004991	Relevance (FRE 401)
126	4/9/2012	Email from E. Hedges to K. Patel re Re: Fw: RM Identification Project	HSBCPIC00007544 - HSBCPIC00007550	None
127	4/9/2012	Email from M. Molynas-Drazal to M. Picarella re: Fw: RM Identification Project	HSBCPIC00010679- HSBCPIC00010682	None
128	4/10/2012	Sametime chat between E. Hedges and M. Picarella	HSBC-ST00003756	Relevance (FRE 401)
129	4/10/2012	Sametime chat between M. Murray and M. Picarella	HSBC-ST00003757	Relevance (FRE 401)
130	4/11/2012	Email from K. Patel to E. Hedges Re:	HSBCPIC00006336	Prejudice (FRE 403); Hearsay (FRE 802)
131	4/11/2012	Email from E. Weiss to E. Weiss re Mike	HSBCPIC-RIST00001535	None
132	4/11/2012	Email from J. Doe to J. Rist	HSBCDLTDOC-00020857	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
133	4/16/2012	Sametime Chat between E. Hedges and J. Doe	HSBC-ST00003076	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
134	4/16/2012	Email from E. Weiss to E. Weiss re Fw: Mike	HSBCPIC-RIST00001444 - HSBCPIC- RIST00001445	None
135	4/17/2012	Sametime chat between J. Doe and E. Hedges	HSBCDLTDOC-00011307	Hearsay (FRE 802); Relevance (FRE 401)

Def. Ex. #	Date	Description	Bates Number	Objection
136	4/18/2012	Email from E. Weiss to E. Weiss re Eileen	HSBCPIC00007026	None
137	4/19/2012	Email from M. Picarella to E. Weiss	HSBCPIC00007128- HSBCPIC00007129	Relevance (FRE 401)
138	4/20/2012	Email from M. Picarella to E. Weiss re	HSBCPIC00005000	None
139	4/20/2012	Email from E. Weiss to E. Weiss re: michael	HSBCPIC-RIST00003653	None
140	4/23/2012	Meeting Cancellation Notice from M. Murray to C. Pizzimbono, E. Hedges, M. Murray, M. Rogers, J. Doe, M. Picarella re Weekly Sales Admin Meeting w/ Pablo Pizzimbono	HSBCPIC00005234	None
141	4/25/2012	Email from E. Weiss to E. Weiss re Mike	HSBCPIC00001997	None
142	4/25/2012	Sametime Chat between J. Doe and C. DeLuca	HSBCDLTDOC-00011343- HSBCDLTDOC-00011344	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
143	4/26/2012	Sametime Chat between E. Hedges and M. Rogers	HSBC-ST00004418	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
144	4/26/2012	Email from M. Picarella to E. Weiss re Re:	HSBCPIC00001704 - HSBCPIC00001705	None
145	4/26/2012	Jang-Hedges Interview Notes	HSBCPIC-RIST00002197	None
146	4/26/2012	Email from M. Picarella to E. Weiss re Re: Hello	HSBCPIC00002167	None
147	4/27/2012	Email from M. Picarella to S. White re: Euromoney- Bermuda Question	HSBCPIC00005151- HSBCPIC00005154	None
148	4/27/2012	Email from M. Picarella to E. Weiss re: Fw: IT meeting	HSBCPIC00007134- HSBCPIC00007136	None
149	4/27/2012	Email from M. Picarella to E. Weiss re: Fw: Euromoney- Bermuda Question	HSBCPIC00007137- HSBCPIC00007140	None

Def. Ex. #	Date	Description	Bates Number	Objection
150	4/27/2012	Email from M. Picarella to E. Weiss re: Fw: Euromoney-Bermuda Question	HSBCPIC00012294-HSBCPIC00012297	None
151	4/27/2012	Email from M. Picarella to E. Weiss re: Fw: Euromoney-Bermuda Question	HSBCPIC00007130-HSBCPIC00007133	None
152	4/30/2012	Meeting Cancellation Notice from M. Murray to C. Pizzimbono, E. Hedges, M. Murray, M. Rogers, J. Doe, M. Picarella re Weekly Sales Admin Meeting w/ Pablo Pizzimbono	HSBCPIC00004918	None
153	5/1/2012	Email from P. Brady to C. Stewart and C. Pizzimbono re: Angelo Gordon	HSBCPIC-RIST00002249-HSBCPIC-RIST00002251	None
154	5/30/2012	Email from E. Weiss to E. Weiss re Re: Fw: Jane Doe Discussion Documentation	HSBCPIC-RIST00002267 - HSBCPIC-RIST00002268	None
155	6/25/2012	Email from E. Weiss to E. Weiss re Mike	HSBCPIC-RIST00001196	None
156	6/26/2012	Email from T. Fruhbeis to C. Pizzimbono re Sales BCC	HSBCPIC-RIST00002257	None
157	6/29/2012	Email from E. Weiss to J. Whang re: Fe: Follow-up	HSBCRIST00007834	None
158	7/1/2012	Email from E. Weiss to E. Weiss re Re: meeting	HSBCPIC-RIST00001263 - HSBCPIC-RIST00001264	None
159	7/1/2012	Email from E. Weiss to M. Picarella re Follow-up	HSBCPIC00001702 - HSBCPIC00001703	None
160	7/2/2012	Email from M. Picarella (yahoo account) to J. Hubbard - subject line and text redacted	Picarella000001 - Picarella000002	Privilege (FRE 502)

<b>Def. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
161	7/3/2012	Email from M. Picarella (yahoo account) to J. Hubbard - subject line and text redacted	Picarella000003 - Picarella000004	Privilege (FRE 502)
162	7/13/2012	Email from J. Doe to J. Rist re:	Doe000180	Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403); Compromise Offer & Negotiation (FRE 408)
163	7/24/2012	Discussion Notes with E. Hedges and S. Jang on July 24, 2012	HSBCPIC-RIST00002202	None
164	7/25/2012	Email from E. Weiss to E. Weiss re Mike	HSBCPIC00002005	None
165	7/26/2012	Email from E. Weiss to M. Picarella re: meeting	HSBCPIC00007147	None
166	7/26/2012	Email from E. Weiss to M. Picarella re Follow-up	HSBCPIC-RIST00001030 - HSBCPIC-RIST00001033	None
167	7/30/2012	Email from E. Weiss to E. Weiss	HSBCPIC-RIST00002701	None
168	7/30/2012	Email from C. Pizzimbono to C. Pizzimbono cc E. Weiss re Discussion with Mike	HSBCPIC00006978	None
169	8/27/2012	E. Hedges Final Written Warning	HSBCPIC-RIST00002203	None
170	8/31/2012	Email from S. Jang to E. Weiss cc L. Li, S. White, C. Pizzimbono re Re: resume with attachment - Picarella, Michael CV	HSBCPIC00001923 - HSBCPIC00001925	None
171	9/7/2012	Email from M. Picarella to C. Pizzimbono bcc M. Picarella re Follow-up	HSBCPIC00001538	None

Def. Ex. #	Date	Description	Bates Number	Objection
172	9/11/2012	Email from C. Pizzimbono to S. White, E. Weiss re Re:	HSBCPIC00001937 - HSBCPIC00001938	None
173	9/12/2012	Email from M. Picarella to J. Blizzard cc A. Holland, B. Goldwasser, J. Levelis, P. Lashmet, S. Welch, S. Agonis, T. Fung, S. Vallabheneni, S. White, C. O'donnell re Re: Suitability Regulatory Issues Recap	HSBCPIC00005159 - HSBCPIC00005162	None
174	9/12/2012	Email from M. Picarella to S. White cc C. Pizzimbono bcc E. Weiss re Re: Fw: Suitability Regulatory Issues Recap	HSBCPIC00001780 - HSBCPIC00001782	None
175	9/12/2012	Email from S. White to E. Weiss re Fw: Suitability Regulatory Issues Recap	HSBCPIC00005222 - HSBCPIC00005225	None
176	9/13/2012	Email from S. White to M. Picarella cc C. Pizzimbono bcc E. Weiss re Re: Names for Mid- year Feedback	HSBCPIC000051999 - HSBCPIC000052000	None
177	9/13/2012	Email from E. Weiss to S. white re Fw: Mid-Year Feedback	HSBCPIC00001964	None
178	9/13/2012	Email from E. Weiss to S. White cc C. Pizzimbono re	HSBCPIC00006981 - HSBCPIC00006982	None
179	9/13/2012	Email from S. White to E. Weiss re Fw: Mid-Year Feedback	HSBCPIC00001958 - HSBCPIC00001959	None

Def. Ex. #	Date	Description	Bates Number	Objection
180	9/13/2012	Email from S. White to E. Weiss cc C. Pizzimbono re	HSBCPIC-RIST00002252 - HSBCPIC-RIST00002253	None
181	9/14/2012	Email from S. White to C. Goodwin cc C. Pizzimbono re Re: Fw: Mid-Year Feedback	HSBCPIC00001932 - HSBCPIC00001933	None
182	9/14/2012	Email from S. White to J. Blizzard cc C. Pizzimbono re Re: Mid-Year Feedback	HSBCPIC00001936	None
183	9/14/2012	Email from J. Kibbe to S. White re Re: Fw: Mid- Year Feedback	HSBCPIC-RIST00002780 - HSBCPIC00002781	None
184	9/18/2012	Email from S. White to M. Picarella cc C. Pizzimbono bcc E. Weiss re Suitability Suggestion	HSBCPIC00001786 - HSBCPIC00001788	None
185	9/18/2012	Email from S. White to M. Picarella bcc E. Weiss re Re: Follow-up with eSuitability Access	HSBCPIC00001795 - HSBCPIC00001797	None
186	9/20/2012	Email from M. Picarella to C. Jenner re Re: Fw: Your question - Swap Sales Authority List	HSBCPIC00023795 - HSBCPIC00023800	None
187	9/20/2012	Email from C. Jenner to S. White re Fw: Your question - Swap Sales Authority List	HSBCPIC00022294 - HSBCPIC00022299	None
188	9/20/2012	Email from M. Picarella to M. Bilbrey re: Escalation	HSBCPIC00005164	None
189	9/24/2012	Record of Investigation, HSBC - Picarella	HSBCPIC00012481 - 00012512	None

<b>Def. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
190	9/24/2012	M. Picarella Mid-Year Review (2012)	HSBCPIC00000100 - HSBCPIC00000106	None
191	9/25/2012	Email from M. Malanga to M. Picarella Re: Integrity Tipline Report	PIC052866	None
192	9/26/2012	Email from L. Kane to M. Malanga Re: Fw: REQUEST: copy of email from Michael Picarella	HSBCPIC00002011	None
193	10/2/2012	Email from M. Picarella to M. Malanga Re: Integrity Tipline Report	PIC052887	None
194	10/2/2012	Email from C. Jenner to S. White re fyi	HSBCPIC00007877 - HSBCPIC00007878	None
195	10/5/2012	Email from S. White to M. Picarella cc C. Jenner bcc E. Weiss re Re: Fw: Americas Global Markets Priority Client Management Book	HSBCPIC00001790 - HSBCPIC00001794	None
196	10/5/2012	Email from M. Picarella to S. White cc C. Jenner re Re:	HSBCPIC00004934 - HSBCPIC00004937	None
197	10/9/2012	Email from M. Malanga to M. Picarella re: Follow-Up Summary	Picarella002483	None
198	10/11/2012	Email from M. Picarella to M. Bilbrey et al. re: Summary of Meetings	HSBCPIC00000001 - 00000009	None
199	10/17/2012	Email from M. Picarella (yahoo account) to M. Malanga re Follow-up	Picarella000432	None
200	10/24/2012	Email from M. Malanga to M. Picarella re: Follow-Up Summary	Picarella002687	None



Def. Ex. #	Date	Description	Bates Number	Objection
201	10/31/2012	Email from C. Jenner to S. White, C. Pizzimbono re my responsibilities update	HSBCPIC00001907 - HSBCPIC00001909	None
202	11/13/2012	Texts between M. Picarella and J. Doe	Doe000001-Doe00006	None
203	12/18/2012	Email from M. Picarella to S. White re Spencer Lake- Requesting Americas Sales Org Charts (with attachment)	HSBCPIC00002962- HSBCPIC00002968	None
204	12/18/2012	Email from S. White to M. Picarella bcc J. Kauh, S. Doernberg re Re: Fw: Sepncer Lake - Requesting Americas Sales Org charts pls	HSBCPIC00002326 - HSBCPIC00002331	None
205	12/18/2012	Email from M. Picarella to S. White re Re: Fw: Spencer Lake - Requesting Americas Sales Org charts pls	HSBCPIC00002319 - HSBCPIC00002325	None
206	12/18/2012	Email from C. Jenner to J. Morgan cc S. White, M. Murray, A. Coventry re Fw: Sepncer Lake - Requesting Americas Sales Org charts pls (REVISED) with attachments - US Sales Org Chart Nov 2012	HSBCPIC00003371 - HSBCPIC00003375	None
207	12/31/2012	2012/2013 HSBC Pay Review Statement - M. Picarella	HSBCPIC00005203 - HSBCPIC00005204	None
208	12/31/2012	2012/2013 HSBC Pay Review Statement - C. Jenner	HSBCPIC00005201 - HSBCPIC00005202	None

<b>Def. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
209	1/3/2013	Sametime chat between M. Picarella and G. Markel	HSBCPIC00004999	Relevance (FRE 401)
210	1/16/2013	Email from M. Picarella (personal e-mail) to M. Bilbrey re	Picarella002802	None
211	1/17/2013	Email from M. Picarella to M. Bilbrey Re: No subject	HSBCPIC00004944	None
212	1/17/2013	Email form M. Bilbrey to M. Picarella bcc M. Malanga re	HSBCPIC00012866 - HSBCPIC00012867	None
213	1/25/2013	Email from M. Picarella to C. Jenner re: year end review	HSBCPIC00008385	None
214	1/31/2013	Email from A. Coventry to S. White re: my seat change	HSBCPIC00006638- HSBCPIC00006639	None
215	2/13/2013	Email from D. Peison to C. Jenner re: Year End Feedback	HSBCPIC00006536	None
216	2/13/2013	Email from P. Brady to S. White re Coordination - Hedge Fund on-boarding with attachments - Active Hedge Fund Pipeline	HSBCPIC00001988 - HSBCPIC00001994	None
217	2/13/2013	Email from M. Picarella (yahoo account) to J. Lodato re Fwd: Nice hearing from you	Picarella005429 - Picarella005430	Relevance (FRE 401)
218	2/22/2013	C. Semeltuskis Year End Review (2013)	HSBCPIC00012653 - HSBCPIC00012659	None

Def. Ex. #	Date	Description	Bates Number	Objection
219	3/4/2013	Email from M. Picarella (yahoo account) to M. Picarella re Fwd: with attachments - Recommendation Letter for Jillian Paige Cornetta	Picarella005431 - Picarella005432	None
220	3/20/2013	Email from M. Bilbrey to M. Picarella (yahoo account) re Re:	Picarella002882 - Picarella002883	None
221	4/8/2013	Email from M. Malanga to M. Picarella (personal e- mail) cc M. Bilbrey re Re: Fw:	HSBCPIC00007337 - HSBCPIC00007343	None
222	4/12/2013	Email from M. Bilbrey to M. Picarella (yahoo account) re Re:	Picarella002941 - Picarella002942	None
223	4/24/2013	Sametime chat between M. Picarella nd B. Goldwasser	HSBCPIC00004942	None
224	4/24/2013	Email from C. Pizzimbono to M. Picarella cc C. Jenner, M. Bilbrey Re: Weekly Commentary	HSBCPIC00010385 - HSBCPIC00010387	None
225	4/25/2013	Email from M. Picarella to M. Malanga Re: Meeting	Picarella000487	None
226	4/26/2013	Email from S. White to M. Picarella cc J. Kauh, M. Bilbrey re Re: Fw: ALL USA CHARTS.ppt	HSBCPIC00004939 - HSBCPIC00004941	None
227	5/13/2013	M. Picarella HSBC Year End Review (2012)	HSBCPIC00000088 - HSBCPIC00000094	None
228	5/21/2013	Email from M. Karam to M. Picarella re Re: Todays Meeting	HSBCPIC00005167 - HSBCPIC00005171	None
229	6/3/2013	Meeting Invitation from M. Karam to M. Picarella re Catch Up	HSBCPIC00004959	None

Def. Ex. #	Date	Description	Bates Number	Objection
230	6/24/2013	Meeting Invitation Acceptance by M. Picarella re NYC Road Show with HSBC USA President and CEO Irene Dörner	HSBCPIC00004960 - HSBCPIC00004962	None
231	6/26/2013	Meeting Invitation Acceptance by M. Picarella re Business Managers Meeting with Mr. O'Sullivan	HSBCPIC00004963	None
232	6/27/2013	<i>Picarella v. HSBC</i> - Charge of Discrimination	HSBCPIC00000311 - HSBCPIC00000324	Relevance (FRE 401); Prejudice (FRE 403)
233	6/28/2013	Meeting Invitation from M. Karam to M. Picarella re Catch Up	HSBCPIC00004964	None
234	7/10/2013	Separation Agreement and Release between HSBC and E. Hedges	HSBCPIC-RIST00002163 - HSBCPIC-RIST00002167	None
235	7/12/2013	Email from M. Karam to M. Picarella re Re: Seagate Global Advisors	HSBCPIC00005029 - HSBCPIC00005032	None
236	8/6/2013	Email from M. Karam to M. Picarella re Re: Fw: Updated Business Case - Point Break.xls	HSBCPIC00003097 - HSBCPIC00003102	None
237	8/14/2013	Email from M. Picarella to K. Rathjen cc K. Sesely re Re: HSBC role	Picarella000662 - Picarella000664	None
238	9/16/2013	Email from M. Karam to M. Picarella re AUTO: Michael Karam is out of the office on business with limited access to emails. (returning 09/23/2013)	HSBCPIC00005037	None
239	9/18/2013	iMessage from +12032933475	Rist003114	Hearsay (FRE 802); Relevance (FRE 401)
240	9/23/2013	Email from M. Karam to M. Picarella re Re: Follow Up	HSBCPIC00004954 - HSBCPIC00004958	None

<b>Def. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
241	9/23/2013	Email from M. Picarella to M. Bilbrey, S. Alderoty cc M. Karam re Fw: P. Schoenfeld Asset Management	HSBCPIC00004945 - HSBCPIC00004953	None
242	9/24/2013	Email from M. Karam to M. Picarella cc M. Bilbrey re Re: P. Schoenfeld Asset Management	HSBCPIC00004974 - HSBCPIC00004983	None
243	9/27/2013	Email from M. Karam to M. Picarella re Re: Fw: Follow Up	HSBCPIC00004965 - HSBCPIC00004973	None
244	11/25/2013	Email from M. Picarella to M. Bilbrey re: Inappropriate Behavior	HSBCPIC00001727	None
245	12/10/2013	M. Picarella HSBC Mid-Year Review (2013)	HSBCPIC00000122 - HSBCPIC00000126	None
246	12/11/2013	Email from M. Picarella to C. Pizzimbono re Fw: Suitability Regulatory Issues Recap	HSBCPIC00025182 - HSBCPIC00025184	None
247	12/31/2013	2013/2014 HSBC Pay Review Statement - M. Picarella	HSBCPIC00005207 - HSBCPIC00005208	None
248	12/31/2013	2013/2014 HSBC Pay Review Statement - C. Jenner	HSBCPIC00005205 - HSBCPIC00005206	None
249	1/1/2014	M. Picarella HSBC Mid-Year Self Assessment	HSBCPIC00005093 - HSBCPIC00005099	None
250	1/25/2014	Email from M. Picarella (yahoo account) to J. Rist (gmail account) re Fwd: Client Attorney Confidential	Rist001119 - Rist001131	None
251	2/21/2014	Email from M. Karam to M. Picarella re Re: Greenwich	HSBCPIC00001188 - HSBCPIC00001191	None
252	3/18/2014	Email from J. Rist (gmail account) to M. Picarella (yahoo account) re Re: attached and in text...	Picarella003550 - Picarella003552	Relevance (FRE 401); Prejudice (FRE 403)

<b>Def. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
253	3/25/2014	Email from M. Picarella (yahoo account ) to J. Rist (gmail) re Re: Late booking - Harvard	Picarella003568 - Picarella003580	Relevance (FRE 401); Prejudice (FRE 403)
254	4/1/2014	Email from J. Rist to A. McGinley re: Re: Mtg	HSBCRIST00002367- HSBCRIST00002373	Relevance (FRE 401); Prejudice (FRE 403)
255	4/2/2014	Email from M. Picarella (yahoo account) to J. Rist (gmail account) re Re: Sr. Exchange Business Manager Manhattan	Picarella003595 - Picarella003598	None
256	4/14/2014	US HR Organizational Structure	HSBCPIC-RIST00000297	None
257	4/22/2014	HSBC Employee Complaint and Anti-Retaliation/Whistle Blower Protection Policy	HSBCPIC-RIST00000005- HSBCPIC-RIST00000007	None
258	5/16/2014	M. Picarella Year-End Review (2013)	HSBCPIC00000127 - HSBCPIC00000130	None
259	5/23/2014	Email from M. Karam to M. Picarella re 2014 Objectives with attachment - GM Sales COO SCORECARD 2014.xls.zip	HSBCPIC00005079	None
260	5/27/2014	Email from M. Picarella (yahoo account) to J. Rist (gmail account) re Re: From the Office of Irene Dorner	Picarella004112 - Picarella004115	Relevance (FRE 401); Privilege (FRE 502); Prejudice (FRE 403)
261	6/25/2014	Email from M. Picarella (yahoo account) to J. Rist (gmail account) re Re: New Job	Picarella004926	Relevance (FRE 401); Prejudice (FRE 403)
262	7/30/2014	Email from M. Picarella to M. Picarella (yahoo account) Fw: Follow up	Picarella002338- Picarella002340	None

<b>Def. Ex. #</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>	<b>Objection</b>
263	10/9/2014	Email from M. Picarella to M. Picarella (yahoo account) re Fw: Draft Objectives	HSBCPIC00005084 - HSBCPIC00005092	None
264	10/15/2014	Email from M. Malanga to M. Picarella cc M. Karam re Meeting Follow-up	HSBCPIC00023866 - HSBCPIC00023869	None
265	10/17/2014	M. Picarella Objectives	HSBCPIC00000143 - HSBCPIC00000148	None
266	10/23/2014	iMessage chain between J. Rist and J. Doe	Doe000033 - 000052	Hearsay (FRE 802); Relevance (FRE 401); Privilege (FRE 502); Prejudice (FRE 403)
267	10/28/2014	Email from M. Picarella to M. Picarella (yahoo account) re - with attachment - Client-Attorney Confidential.xls.zip	Picarella006060	Privilege (FRE 502); Relevance (FRE 401)
268	11/21/2014	M. Picarella Mid Year Review (2014)	HSBCPIC00000115	None
269	11/24/2014	E-mail from M. Picarella to M. Bilbrey Re: Complaint	HSBCPIC00004984	None
270	11/25/2014	Record of Investigation, M. Picarella	HSBCPIC00005457 - 00005458	None
271	11/26/2014	Email from M. Malanga to M. Picarella re Re: My VM	HSBCPIC00004985 - HSBCPIC00004987	None
272	12/1/2014	Email from M. Picarella to M. Bilbrey, M. Malanga re Fw: My VM	HSBCPIC00007465 - HSBCPIC00007467	None
273	12/11/2014	Email from M. Picarella to M. Karam re Re: Meeting	HSBCPIC00005100 - HSBCPIC00005109	None
274	12/12/2014	Email from D. Geed to M. Picarella (yahoo account) re RE: NY Post	Picarella005447 - Picarella005452	None

Def. Ex. #	Date	Description	Bates Number	Objection
275	12/12/2014	New York Post Article by K. Dugan - <i>The Bank is closed for HSBC sex-harrass accuser</i>		None
276	12/22/2014	Record of Investigation, N/A re: M. Karam concerns about NY Post article	HSBCPIC00005453 - 00005456	None
277	12/31/2014	M. Picarella Mid Year Review (2014)	HSBCPIC00000079	None
278	1/3/2015	New York Post Article by K. Dugan - <i>HSBC banker chatted about 'favor' for a client's son</i>		Hearsay (FRE 802); Relevance (FRE 401); Prejudice (FRE 403)
279	1/9/2015	Email from M. Karam to M. Picarella cc D. Silber re Re: Request	HSBCPIC00005110 - HSBCPIC00005111	None
280	1/14/2015	Unofficial Transcription: January 14, 2015 Call Between Dan Silber and Kevin Dugan		None
281	1/15/2015	Letter from D. Marshall to J. Hubbard re: Michael Picarella		None
282	2/11/2015	Email from B. Stees to M. Kutas Fw: For chat-LAST PERSON ON THE LIST	HSBCPIC00005355	None
283	2/11/2015	New York Post Article by K. Dugan - <i>HSBC singles out worker for leaks: sources</i>		None
284	2/25/2015	Letter from J. Hubbard to M. Kutas re meeting with Picarella		Relevance (FRE 401); Prejudice (FRE 403)
285	3/24/2015	Email from M. Kutas to R. Lord re: Email Search Request	HSBCPIC00005358	Relevance (FRE 401); Prejudice (FRE 403)



Def. Ex. #	Date	Description	Bates Number	Objection
286	3/26/2015	Letter from S. Roskell to M. Picarella re:termination of employment at HSBC	HSBCPIC00005259	None
287	3/31/2015	HSBC Financial Crime Investigations	HSBCPIC00005260 - HSBCPIC00005263	Hearsay (FRE 802); Prejudice (FRE 403)
288	4/20/2015	<i>Picarella v. HSBC</i> - Plaintiff's Response to Defendant's Second Set of Interrogatories		None
289	5/14/2015	<i>Picarella v HSBC</i> - Joint Stipulations		None
290	5/15/2015	<i>Picarella v. HSBC</i> - Plaintiff's Response to Defendant's Request to Admit		None
291	5/18/2015	M. Malanga Deposition Handwritten Chart		Relevance (FRE 401); Hearsay (FRE 802)
292		Michael Picarella Resume	HSBCPIC000001912 - HSBCPIC000001913	None
293		On/Off Track: A Checkpoint Assessment	HSBCPIC000051938	None
294		"What is Calibration" Powerpoint Presentation	HSBCPIC-RIST00003784	Hearsay (FRE 802)
295		Performance Management FAQs	HSBCPIC00051939- HSBCPIC00051964	None
296		HSBC Statement of Business Principles and Code of Ethics	HSBCPIC-RIST00002174 - HSBCPIC-RIST00002193	None
297		HSBC Anti-Harassment Policy	HSBCPIC-RIST00000008- HSBCPIC-RIST00000012	None
298		HSBC Antiretaliation Policy	HSBCPIC-RIST00000005- HSBCPIC-RIST00000007	None
299		"Where's Waldo? Deluxe Edition," Martin Handford (Candlewick Press 3rd U.S. edition 2011)	N/A	Relevance (FRE 401); Prejudice (FRE 403)